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Sep 20 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2021-000303
WCC File No. 1704918

Raqucal Cunningham.....Appellant,

v.

BMW Manufacturing Corp., Employer and
Hartford Accident & Indemnity Company, Carrier..... Respondents,

Respondents' Motion for Extension to File Initial Brief

Respondents, by and through its attorney, hereby move before this Honorable Court for a thirty (30) day extension in which to file its Initial Brief. The brief is due on September 20, 2021. Respondents' counsel requests additional time in which to submit the brief caused by uncertainty as to whether Appellant had properly perfected her appeal. Appellant failed to provide the undersigned with a corrected proof of service.

Thus, Respondents' Initial Brief shall be filed on or before October 22, 2021.

Respectfully submitted,



Vernon F. Dunbar

McAngus Goudelock & Courie, LLC
55 East Camperdown Way
Suite 300
Greenville, South Carolina 29601
864-239-6735
vernon.dunbar@mgclaw.com
Attorney for Respondents

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Workers' Compensation Commission

Appellate Case No. 2021-000303
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Raqucal Cunningham Appellant,

v.

BMW Manufacturing Employer,

and

Hartford Accident & Indemnity Company, Respondents,

PROOF OF SERVICE

I hereby certify that I have this 20th day of September 2021, caused to be served a copy of Respondent's Motion for Extension of Time to File the Initial Brief by mailing a copy of same, postage prepaid, in the United States mail, and via Fax with sufficient postage affixed as follows:

Raqucal Cunningham
114 Vermillian Drive
Spartanburg, South Carolina 29306

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211



Vernon F. Dunbar
McAngus, Goudelock & Courie LLC
Post Office Box 2980
55 East Camperdown Way, Suite 300 (29601)
Greenville, South Carolina 29602
(864) 239-4000
Attorneys for Appellant
September 20, 2021

**Reply To**

VERNON F. DUNBAR
Direct Dial: (864) 239-6735
vernon.dunbar@mgclaw.com

September 20, 2021

VIA FAX/US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED**Sep 20 2021****SC Court of Appeals**

RE: Raqucal Cunningham v. BMW Manufacturing and Hartford Accident &
Indemnity Company c/o Sedgwick Claims Management Inc.
Date of Accident: May 2, 2017
WCC File No.: 1704918
Our File No.: 20194.21241
Claim No.: 30177811453-0001

Dear Ms. Kitchings:

Please find enclosed for filing the original copy of Respondents' Motion for Extension of Time to File the Initial Brief in the above referenced matter, along with proof of service and the required \$50.00 filing fee.

By copy of this letter to Raqucal Cunningham, unrepresented Appellant, I am providing her with a copy of the Motion advising her of my communication with you.

Very truly yours,

Vernon F. Dunbar

VFD/tls
Enclosures

cc: Raqucal Cunningham, *pro se* Appellant
Donell Smith, BMW Manufacturing Corporation, LLC
Emily Gregg, Sedgwick CMS
Andrew Walker, BMW Manufacturing Corporation, LLC

McANGUS GOUDELOCK & COURIE LLC

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