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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

Appellate Case No. 2021-000585

Ana Rodriguez Galvan,
Employee.....Respondent,

v.

Griffin Stafford North Charleston, Employer; Accident Fund General Insurance Company c/o
Accident Fund Insurance Company of America, Hartford Accident & Indemnity Co., and
Employers Preferred Insurance Company, Carrier, Defendants

Of whom, Griffin Stafford North Charleston, Employer and Employers Preferred Insurance
Company, Carrier, are the Appellants

And

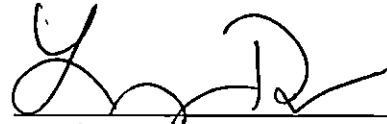
Accident Fund General Insurance Company c/o Accident Fund Insurance Company of America
and Hartford Accident & Indemnity Co.

.....Respondents

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENTS
GRIFFIN STAFFORD NORTH CHARLESTON AND
HARTFORD ACCIDENT & INDEMNITY CO.

Respondents, by and through the undersigned attorney, hereby move before this Honorable
Court an extension in which to file Respondents' Initial Brief. As grounds for this Motion,
Respondents would show additional time is needed as the undersigned attorney is working
diligently to ascertain assistance with handling the ongoing appeal. Additionally, in the interest of
judicial economy, the parties are working efficiently to determine whether the claim may be
resolved and the additional time would allow the parties to exhaust that remedy. Respondents
respectfully request this Honorable Court allow an extension of time between thirty (30) and forty-

five (45) days. Respondents would further note that all above-captioned parties have consented to the request referenced herein. Respondents thank the Honorable Court for the consideration of such request.



Lynnley D. Ross
Willson Jones Carter & Baxley, P.A.
4922 O'Hear Ave., Suite 301
North Charleston, SC 29405

Attorney for Respondents Griffin
Stafford North Charleston and Hartford
Accident & Indemnity Co.

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Company, Carrier, are the Appellants

And

Accident Fund General Insurance Company c/o Accident Fund Insurance Company of America
and Hartford Accident & Indemnity Co.
.....Respondents

PROOF OF SERVICE

I hereby certify that I have served Respondents' Motion for Extension of Time to File Initial
Brief by depositing a copy in the United States Mail, as well as e-mail, postage prepaid, on
September 9, 2021 addressed to the attorneys of record:

Michael J. Jordan, Esquire Steinberg Law Firm, LLP
F. Elliotte Quinn IV, Esquire
P.O. Box 1028
Goose Creek, SC 29445

F. Elliotte Quinn, IV, Esquire Steinberg Law Firm, LLP
P.O. Box 2670

Summerville, SC 29484

F. Elliott Quinn, IV, Esquire
103 Grandview Drive, Suite A Summerville, SC 29483

Regan A. Cobb, Esquire
Holder Padgett Littlejohn+ Prickett, LLC
945 Houston Northcutt Blvd.
Mt. Pleasant, SC 29464

Kathryn Fiehrer Walton, Esquire
Wood Law Group, LLC
PO Box 20550
Charleston, SC 29413



Lynnley D. Ross
Willson Jones Carter & Baxley, P.A.
4922 O'Hear Ave., Suite 301
North Charleston, SC 29405

Attorney for Respondents Griffin
Stafford North Charleston and Hartford
Accident & Indemnity Co.

North Charleston, South Carolina



willson jones
carter & baxley

attorneys at law
greenville | charleston | columbia
charlotte | myrtle beach | raleigh | atlanta

Lynnley D. Ross
Direct (843) 284-1090
Fax (843) 284-1081
ldross@wjcbllaw.com

4922 O'Hear Ave.
Suite 301
North Charleston, SC 29405
www.wjcbllaw.com

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SC Court of Appeals

Via Email and Certified Mail

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

Re: Ana Rodriguez Galvan vs. Griffin Stafford N. Charleston
Appellate Case No.: 2021-000585
WCC File No.: 1515209 DOI: 10/9/2015
Carrier: Hartford Accident & Indemnity Company - Claim No.: Y97C00172
WJCB File No.: 0100.03662

Dear Ms. Kitchings:

Please find enclosed the original and one (1) copy of Respondents' Motion for Extension of Time to File Initial Brief in the above-referenced matter. I would appreciate you filing the original Motion for Extension of Time to File Initial Brief and returning a clocked copy of the same to my office in the pre-paid envelope enclosed.

By copy of this correspondence and enclosures to all interested parties, I am serving them with a copy of Respondents' Motion for Extension of Time to File Initial Brief.

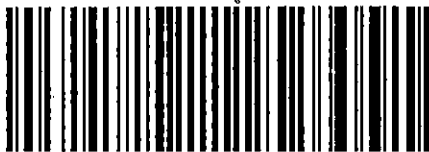
With kindest regards,
WILLSON JONES CARTER & BAXLEY, P.A.

Lynnley D. Ross

Enc: Motion for Extension of Time to File Initial Brief
Cc: Michael J. Jordan, Esquire
Regan A. Cobb, Esquire
F. Elliotte Quinn, IV, Esquire
Kathryn Walton, Esquire

DLS
WILLSON JONES CARTER & BAXLEY, P.A.
ATTORNEYS AT LAW
4922 O'HEAR AVE.
SUITE 301
NORTH CHARLESTON, SC 29405

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SC Court of Appeals

THE HONORABLE JENNY ABBOTT KITCHINGS
SOUTH CAROLINA COURT OF APPEALS
P.O. Box 11629
COLUMBIA, SC 29211



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carter & baxley

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