

**RECEIVED**

**Oct 11 2021**

**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 their undersigned counsel, hereby moves this honorable court  
for a thirty (30) day extension in which to file respondents return to brief of petitioner. Based on  
current information from this court, Respondents' Return is currently due on October 11, 2021. If  
the extension is granted, the brief will be due on November 10, 2021. As grounds for this motion,

Respondents would show that additional time is needed as firm counsel who will subsequently enter an appearance on this matter and will be responsible for briefing has numerous appellate cases presently which require the filing of briefs.



---

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.

RECEIVED

Oct 11 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPESNATION 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

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  
October 11, 2021 addressed to the attorneys of record:

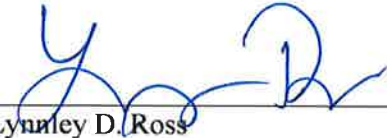
Michael J. Jordan, Esquire Steinberg Law Firm, LLP  
F. Elliotte Quinn IV, Esquire  
P.O. Box 1028  
Goose Creek, SC 29445

F. Elliott 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



Lynneley 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

October 11, 2021

**RECEIVED**

**Oct 11 2021**

**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