

**In The South Carolina Court of Appeals
On Appeal Form the South Carolina Workers' Compensation Commission
Appellate Case No: 2019-001936**

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Jan 28 2022

SC Court of Appeals

Jennie Cox, Employee

Appellant,

v.

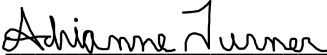
Appellate Case No: 2019-001936

**Palmetto State Transportation, Employer
And Cherokee Insurance Company,
Respondents**

MOTION FOR LEAVE TO SERVE AND FILE APPELLANT'S FINAL BRIEF OUT OF TIME

1. The time for serving the Appellant's Final Brief in this appeal from the Workers' Compensation Commission has passed.
2. Previously, Counsel for Appellants experienced a protracted illness which caused an extended absence from the office and a corresponding period of catching up on work-related deadlines upon Counsel's return. Counsel also experienced an unanticipated family emergency during the holiday season which adversely affected Counsel's efforts to complete an influx of work related responsibilities during and immediately after the holidays. Counsel's delay in preparing Appellant's Final Brief occurred due to these circumstances.
3. Appellants Final Brief is now completed and a bound copy of it has been placed in United States Mail for purposes of filing and service on Respondent. As well, a bound copy of Record on Appeal has been forwarded to the Court.
4. This motion is not being made for purposes of delay; rather, the request has been necessitated by the circumstances set forth above.

Accordingly, Appellant requests that the Appellant's Final Brief as well as the required bound copy of the record on appeal be accepted for purposes of filing and that any remaining deadlines associated with this Appeal be set accordingly.



Adrienne L. Turner

Bar # 6840

Counsel for Appellant

Columbia, SC
January 28, 2022

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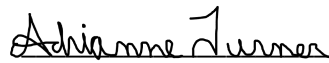
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SC Court of Appeals

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the Motion for Leave to File Appellant's Final Brief Out of Time was sent by Electronic Mail and/or by United States Mail, postage prepaid, on January 28, 2022 to:

George Gallagher, Esquire
ggallagher@speed-seta.com
PO Box 11669
Columbia, SC 29211



Adrienne L. Turner

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Jan 28 2022

SC Court of Appeals

TURNER LAW, LLC

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Columbia, SC 29221

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aturner@turnerlawsc.com

Facsimile: (803) 271-0451

January 28, 2022

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Jenny Cox v. Palmetto State Transportation – Appellate Case No. 2019-001936

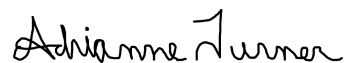
Dear Ms. Kitchings:

Please find enclosed for filing Appellant's Motion for Leave to File Appellants Final Brief Out of Time. Also enclosed is a check in the amount of fifty dollars (\$50.00) to cover the cost of filing.

By copy of this letter, I am serving the same on counsel of record, George Gallagher.

With kind regards, I am

Sincerely,



Adrienne L. Turner

Enclosures
cc: George Gallagher