

RECEIVED

Feb 16 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSTAIION COMMISSION
TRIAL COURT CASE NO. 1423028

Cassandra D. Stallings, Employee, Respondent,

v.

Hubbell Power Systems, Employer and Liberty Mutual Insurance Co., Carrier, Appellants

Appellate Case No. 2021-000965

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF RESPONDENT

The Respondent respectfully requests a thirty (30) day extension of time to file its Initial Brief. Andrea C. Roche, attorney for the Respondent, was recently associated on this appeal. A thirty (30) day extension of the original deadline of February 18, 2022, would establish a new deadline of March 20, 2022, for service and filing of Respondent's Initial Brief.



Andrea C. Roche
Mickle & Bass, LLC
P.O. Box 5639
Columbia, SC 29250
(803) 929-0029
Attorney for Respondent

February 16, 2022

RECEIVED

Feb 16 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA
WORKERS' COMPENSTAION COMMISSION
TRIAL COURT CASE NO. 1423028

Cassandra D. Stallings, Employee, Respondent,

v.

Hubbell Power Systems, Employer and Liberty Mutual Insurance Co., Carrier, Appellants

Appellate Case No. 2021-000965

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Brief of Respondent by depositing a copy of it in the United States Mail, postage prepaid, and via electronic mail on February 16, 2022, addressed to the attorney of record,

Clarke W. McCants, III
Mccants3rd@aol.com
Clarke W. McCants, IV
Clarkemccants4@gmail.com
Nance & McCants
P.O. Box 2881
Aiken, SC 29802
Attorneys for Appellants

February 16, 2022



Andrea C. Roche, Esquire
Mickle & Bass, LLC
Post Office Box 5639
Columbia, South Carolina 29250
(803) 929-0029
Attorney for Respondent



Ann McCrowey Mickle*†
J. Alan Bass*†
Derrick L. Williams*†
Andrea C. Roche *†
Mary E. Jordan†
James "Jamie" Davidson, IV

February 16, 2022

Reply to: Columbia Office

RECEIVED

Feb 16 2022

SC Court of Appeals

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

RE: Cassandra D. Stallings, Employee-Respondent v. Hubbell Power Systems, Employer, and Liberty Mutual Insurance Co., Appellants
Appellate Case No. 2021-000965

Dear Ms. Kitchings:

Enclosed for filing please find the original and two (2) copies of a Motion for Extension of Time to File Initial Brief of Appellant-Respondent in the above case, along with the \$50 filing fee. Please return a clocked-in copy in the self-addressed, stamped envelope.

If you have questions, please do not hesitate to contact me.

With kind regards, I am,

Sincerely,

Andrea C. Roche, Esquire
SC Bar No. 7563
Mickle & Bass, LLC
Post Office Box 5639
Columbia, South Carolina 29250
(803) 929-0029
Attorney for Respondent

ACR/arh

Enclosures

cc: Clarke W. McCants, III
Mccants3rd@aol.com
Clarke W. McCants, IV
Clarkemccants4@gmail.com
Nance & McCants
P.O. Box 2881
Aiken, SC 29802
Attorneys for Appellants

930 Oakland Avenue
PO Box 10751
Rock Hill, SC 29731
(803) 980.0083
(803) 328.2525 fax

1519 Richland Street
PO Box 5639
Columbia, SC 29250
(803) 929.0029
(803) 929.1024 fax

1039 44th Avenue North
Suite 102
Myrtle Beach, SC 29577
(843) 839.2501
(843) 839.2507 fax

1517 Sam Rittenburg Blvd.
Charleston, SC 29407
(843) 406-2800
(888) 884-8311 fax

†Partner

*former SC Workers' Compensation Commissioner

www.MickleAndBass.com