

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 06 2022

**SC Court of Appeals**

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

Commissioners Aisha G. Taylor, Susan S. Barden and Gene McCaskill

Appellate Case No. 2021-001174

Trial Court Case No. 1717573

Jeffrey McCoy, Employee, ..... Appellant-Respondent,

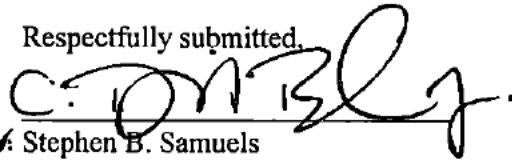
v.

Cromed, LLC, Employer, and  
Guarantee Ins. Co. (in Liquidation)/S.C. Property & Casualty Ins. Guaranty  
Assoc., Carrier, Respondents-Appellants, ..... Respondents-Appellants.

**MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S INITIAL BRIEF OF APPELLANT-RESPONDENT**

Appellant-Respondent, by and through his undersigned attorney hereby moves this Honorable Court for a 30-day extension in which to file the **Respondent's Initial Brief of Appellant-Respondent**. The Brief is currently due on April 4, 2022. If the extension is granted, the Brief will be due on May 4, 2022. As grounds for this Motion, Appellant would show additional time is needed for the writing of his brief as counsel has been unexpectedly out of town since March 24, 2022 attending to matters with his father's declining health and subsequent passing on April 1, 2022. Just as well, counsel has multiple matters pending before this Court, many of which require the filing of briefs.

Respectfully submitted,

  
for: Stephen B. Samuels

SAMUELS REYNOLDS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000

April 4, 2022  
Columbia, South Carolina

stephen@samuelsreynolds.com  
ATTORNEY FOR APPELLANT-RESPONDENT

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA  
Workers' Compensation Commission

WCC File No. 1717573

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SC Court of Appeals

Jeffrey W. McCoy, Claimant, ..... Appellant-Respondent,

v.

Cromed, LLC, Employer,  
and Guarantee Ins. Co. (*in liquidation*)/S.C. Property & Casualty Ins. Guaranty Assoc,  
Carrier, ..... Respondents-Appellants.

**PROOF OF SERVICE**

I certify that I, Wanda Powell, paralegal for the Samuels Reynolds Law Firm, LLC, have caused the **Motion for Extension of Time to File Respondent's Initial Brief of Appellant-Respondent** to be served on the parties below, via electronic service, addressed as follows:

Mark D. Cauthen, Esquire  
Cauthen Law Group, LLC  
2231 Devine Street, Suite 101  
Columbia, SC 29205  
[mcauthen@cauthenlawgroup.com](mailto:mcauthen@cauthenlawgroup.com)

April 4, 2022



Wanda Powell  
SAMUELS REYNOLDS LAW FIRM, LLC  
1320 Richland Street  
Columbia, SC 29201  
(803) 779-4000



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STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
C. DAVID BEALE, JR.  
ATTORNEYS AT LAW

April 4, 2022

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APR 06 2022  
SC Court of Appeals

Via email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Jeffrey W. McCoy v. Cromed, LLC  
Appellate Case No.: 2021-001174

Dear Ms. Kitchings:

Enclosed for filing please find our **Motion for Extension of Time to File the Respondent's Initial Brief of Appellant-Respondent** regarding the above referenced matter. We have also enclosed our law firm's check made payable to SC Court of Appeals in the amount of \$50.00 as payment of the filing fee.

If you would kindly have your staff file the **Motion for Extension of Time to File the Respondent's Initial Brief of Appellant-Respondent and Proof of Service** and return a clocked copy to me.

Respectfully,

A handwritten signature in black ink, appearing to read "Wanda Powell", is written over the word "Respectfully,".

Wanda Powell  
Paralegal to Stephen B. Samuels

/wp  
Enclosure(s) as stated

cc: Mark D. Cauthen, Esquire

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COLUMBIA, SC 29201

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**SC Court of Appeals**

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



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