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May 27 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SOUTH CAROLINA
WORKERS' COMPENSATION COMMISSION

WCC File No.

Court of Appeals Case No. 2019-000556

Isaac D. Brailey, Claimant.....Appellant,

v.

Michelin North America, Inc., (US7), Employer, and
Safety National Casualty Corp., Carrier, Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE REPLY TO RETURN TO PETITION
FOR REHEARING**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondents Michelin North America, Inc., (US7), Employer, and Safety National Casualty Corp., Carrier move this Court for an order granting an extension of time for Respondents to serve and file Respondents' Reply to Appellant's Return to the Petition for Rehearing. Currently Respondents' Reply is due on Tuesday, May 31, 2022. The undersigned Respondents requests an extension of time of three (3) days to file and serve Respondents' Reply, as Respondents need additional time to respond to the arguments raised by the Appellant and due to other deadlines, Memorial Day Holiday, and work obligations. The new deadline for Respondents' Reply will be Friday, June 3, 2022. This is Respondent's first request for an extension to file and serve Respondents' Reply.

Additionally, the undersigned Respondents request that all filing/service deadlines be held in abeyance pending the Court's ruling on this motion.

WE SO MOVE:

ROBINSON GRAY STEPP & LAFFITTE, LLC

By: 

Grady L. Beard, Esquire
Jasmine D. Smith, Esquire
1310 Gadsden Street (29201)
Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400

Attorneys for Respondents

Columbia, South Carolina
May 27, 2022

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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

WCC File No. 1708221

Court of Appeals Case No. 2019-000556

Isaac Brailey, Claimant.....Appellant,

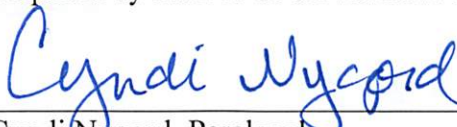
v.

Michelin North America, Inc., (US7), Employer,
and Safety National Casualty Corp., Carrier Respondents.

PROOF OF SERVICE

I certify that I have caused Respondents' Motion for Extension of Time to File Reply to Return to Petition for Rehearing to be served on Appellant via email and by depositing a copy of it in the United States Mail, postage prepaid, addressed to Stephen Samuels, Esquire, 1320 Richland Street, Columbia, SC 29201; The Honorable Jenny Abbott Kitchings, Clerk of Court, 1220 Senate Street, Columbia SC 29201 via e-mail; and Ms. Amy Bracy, Judicial Director, South Carolina Worker' Compensation Commission, 1333 Main Street, Columbia, SC 29201 (via U.S. mail).

I further certify that all parties required by Rule to be served have been served.



Cyndi Nygord, Paralegal

Columbia, South Carolina
May 27, 2022

From: [Cynthia D. Nygord](#)
To: stephen@samuelsreynolds.com
Cc: [Grady Beard](#); [Jasmine D. Smith](#); wanda@samuelsreynolds.com; [Cindy Lamb](#); [Christine Skalamera](#)
Bcc: [{F40326}.Clients@f8eed.imatege.work](#)
Subject: 2019-000556 - Respondents" Motion for Extension of Time to File Reply [IMAN-CLIENTS.FID40326]
Date: Friday, May 27, 2022 5:16:41 PM
Attachments: [image001.png](#)
[Respondents Motion for Extension of Time 5.27.22.pdf](#)
[Proof of Service - Respondents Motion for Extension of Time.pdf](#)

Attached herewith for service upon you, please find Respondents Motion for Extension of Time to File Reply to Return for Petition for Rehearing which is being filed with SC Court of Appeals this afternoon.

A copy of this email will be attached to the Proof of Service.

With kindest regards,
Cyndi Nygord



CYNDI NYGORD PARALEGAL

DIRECT 803.231.7845

VCARD

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Columbia, SC 29201

 **MERITAS** LAW FIRMS WORLDWIDE



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