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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2022-CP-10-00126

Ex Parte Privilege Underwriters Reciprocal Exchange, Appellant.

In re: Ann and James Cavanaugh, Respondents,

v.

Kiawah Development Partners, LLC; Knight Residential Group Charleston, LLC;
H&J Services, LLC; Pro Roofers, Inc.; Professional Roofers, Inc.; Pro Roofing
Company; and Construction Applicators Charleston, LLC; Respondents.

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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*Attorneys for Respondents Ann and James
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Pursuant to Rule 240 and 263(b), SCACR, Respondents Ann and James Cavanaugh move for an extension of time in which to serve and file their Initial Brief and Designation of Matter to be included in the Record on Appeal. Respondents request an extension of thirty days to file the

Initial Brief and Designation of Matters which are currently due September 14, 2022. This is the first request for an extension filed by these Respondents.

The grounds for this motion are that the parties have reached an agreement in principle that will moot the issue on appeal. Respondents seek an extension of thirty (30) days to allow the parties time to finalize resolution paperwork and gather the requisite signatures. Appellant Privilege Underwriters Reciprocal Exchange has expressly consented to this motion. This thirty-day delay will not prejudice the rights of any of the other respondents.

For these reasons, Respondents Ann and James Cavanaugh request an extension of the deadline for filing and service of the Initial Brief and Designation of Matters until October 14, 2022.

Respectfully submitted,

s/ Alexandra Scott O'Neill

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PROOF OF SERVICE

I hereby certify that on **September 8, 2022** a true and correct copy of Respondents Ann and James Cavanaugh's **MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was served via email (see attached) on all counsel of record as follows:

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Motion for Extension of Time Cavanaugh v. PURE

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Thu, Sep 8, 2022 at 8:59 PM

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All-

Attached for service upon you is Respondents Ann and James Cavanaugh's MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL.

Have a nice evening.

Thank you,
Ali



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