

**RECEIVED**

**Oct 21 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

---

Case No. 2016-CP-07-2541  
Appellate Case No. 2022-000231

---

**Forum Benefits, LLC,**

**Appellant,**

**v.**

**Brian Bannon and AssuredPartners, NL,**

**Respondents.**

---

**PETITION FOR EXTENSION UNTIL NOVEMBER 4, 2022 TO FILE/SERVE INITIAL  
BRIEF OF RESPONDENTS**

Respondents, Brian Bannon and AssuredPartners, NL, pursuant to Rules 208(a)(2), 240, and 263(b) SCACR, petition this Honorable Court for an order extending the time to file and serve their Initial Brief by 10 calendar days until Friday, November 4, 2022. This Petition is Respondents' second request for an extension, is made in good faith and not intended for delay, and is based on the following grounds:

1. Appellant served its Initial Brief on May 27, 2022.
2. On June 14, 2022, Respondents filed a Notice of Non-Compliance and Motion for Extension of Time to File Initial Brief, notifying the Court of Appellant's non-compliance with

Appellate Court Rule 208(b)(4) and requesting to have until 60 days after service of Appellant's Amended Initial Brief to serve its Initial Brief.

3. This Court granted Respondent's motion by Order dated August 12, 2022.

3. Appellant served its Amended Initial Brief of Appellant on August 26, 2022, making Respondents' Initial Brief due on Tuesday, October 25, 2022.

4. Respondents' counsel, Jeffrey Lehrer, has had several other litigation obligations in other matters since the filing of Appellant's Amended Initial Brief, including, but not limited to, a trial in the Middle District of Georgia from October 3-6, 2022, and in-person depositions in Salt Lake City, Utah from October 17-21, 2022.

5. Appellant, through counsel, has consented to Respondents' petition for the extension requested herein.

Therefore, Respondents respectfully request, with the consent of counsel for Appellant, an extension of 10 calendar days to file its Initial Brief, creating a new deadline of Friday, November 4, 2022.

Respectfully submitted this 21 day of October, 2022.

s/ Jeffrey A. Lehrer

Jeffrey A. Lehrer (SC Bar No. 16687)  
FORD & HARRISON LLP  
100 Dunbar Street, Suite 300  
Spartanburg, SC 29306  
Telephone: (864) 699-1100  
Facsimile: (864) 699-1101  
[jlehrer@fordharrison.com](mailto:jlehrer@fordharrison.com)

*Attorney for Appellant*

**RECEIVED**

**Oct 21 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

---

Bentley D. Price, Circuit Court Judge

---

Appellate Case No. 2022-000231

Forum Benefits, LLC, ..... Appellant

v.

Brian Bannon and AssuredPartners, NL, ..... Respondents

---

**PROOF OF SERVICE**

---

Jeffrey A. Lehrer  
(SC Bar No. 16687)  
FORDHARRISON LLP  
100 Dunbar Street, Suite 300  
Spartanburg, SC 29306  
Telephone: (864) 699-1100  
Facsimile: (864) 699-1101  
[jlehrer@fordharrison.com](mailto:jlehrer@fordharrison.com)  
*Attorneys for Respondents*

I, Jeffrey A. Lehrer, of FordHarrison, LLP, counsel for Brian Bannon and AssuredPartners, NL, hereby certify that the foregoing **RESPONDENT'S PETITION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** has been served upon opposing counsel, pursuant to the Supreme Court's Order 'Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules,' (as amended May 6, 2022), by e-mailing a copy to counsel at their AIS e-mail address, as reflected below:

Timothy David St. Clair, Esq.  
Parker Poe Adams & Bernstein LLP  
110 East Court Street, Suite 200  
Greenville, SC 29601  
[timstclair@parkerpoe.com](mailto:timstclair@parkerpoe.com)

Katon Edwards Dawson, Jr., Esq.  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Columbia, SC 29201  
[katondawson@parkerpoe.com](mailto:katondawson@parkerpoe.com)

Steven R. LeBlanc, Esq.  
P.O. Box 9198  
Greenville, South Carolina 29604  
[steve@leblancllc.com](mailto:steve@leblancllc.com)  
*Attorneys for Appellant*

Respectfully submitted,

s/ Jeffrey A. Lehrer  
Jeffrey A. Lehrer, Esq.  
(S.C. Bar No. 16687)  
FORDHARRISON LLP  
100 Dunbar Street, Suite 300  
Spartanburg, SC 29306  
Telephone: (864) 699-1100  
Facsimile: (864) 699-1101  
[jlehrer@fordharrison.com](mailto:jlehrer@fordharrison.com)  
*Attorneys for Respondents*

Dated: October 21, 2022

Writer's Direct Dial:  
JEFFREY A. LEHRER  
864-699-1152  
jlehrer@fordharrison.com

October 21, 2022

**RECEIVED**  
**Oct 21 2022**  
**SC Court of Appeals**

**VIA: E-FILE** ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals

**Re: Forum Benefits, LLC v. Brian Bannon and AssuredPartners, NL**  
**Appellate Case No. 2022-000231**

Dear Ms. Kitchings:

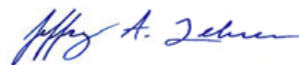
Please find attached Respondent's Petition for Extension of Time to File Initial Brief, along with the Proof of Service thereof.

Thank you for your attention to this matter. Please let me know if you have any questions or require additional information.

With highest regards, I remain

Very truly yours,

FORD & HARRISON LLP



JEFFREY A. LEHRER

JAL/hmr

Attachments

cc: Steven R. LeBlanc, Esq. (via: e-mail - [steve@leblancllc.com](mailto:steve@leblancllc.com))  
Timothy David St. Clair, Esq. (via: e-mail [timstclair@parkerpoe.com](mailto:timstclair@parkerpoe.com))  
Katon Edwards Dawson, Jr., Esq. (via: e-mail [katondawson@parkerpoe.com](mailto:katondawson@parkerpoe.com))

WSACTIVE LLP:13517658.1