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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jean Hoefer Toal, Circuit Court Judge

Appellate Case No. 2022-000366

Covil Corporation, by and
through its duly appointed
Receiver, Peter D. Protopapas,

Respondent,

v.

Pennsylvania National Mutual
Casualty Insurance Company,

Petitioner.

PETITIONER’S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Pennsylvania National Mutual Casualty Insurance Company (“Penn National”), by and through counsel, and pursuant to the South Carolina Rules of Appellate Procedure, Rule 263(b) and Rule 240, moves the Court for a twenty (20) day extension of time to file Petitioner’s Initial Brief. Counsel respectfully requests this extension due to a number of other impending litigation obligations, including preparations for an impending date certain trial, which include the scheduled depositions of a number of fact and expert witnesses, some of which will require counsel to travel out of state. Additionally, the parties to this action are participating in the mediation of a separate Covil Corporation coverage action on November 15, 2022, whose outcome could impact the issues on appeal in this case. Further, counsel for the undersigned has communicated with counsel for the Respondent, who has consented to the requested extension.

