

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jean Hoefler Toal, Circuit Court Judge

Case No. 2020-CP-40-01226
Appellate Case No. 2022-000366

RECEIVED

Dec 05 2022

S.C. SUPREME COURT

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

Respondent,

v.

Pennsylvania National Mutual Insurance Company,

Petitioner.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

Respondent Covil Corporation, by and through its duly appointed Receiver, Peter D. Protopapas (“the Receiver”), respectfully requests a twenty-day extension of time to file his response brief. The current deadline of the Receiver’s response brief is December 30, 2022. With a twenty-day extension, the new deadline for the Receiver’s response brief would be January 19, 2023. The Receiver requests this extension because of scheduling issues and the professional obligations of counsel, including a December date certain trial in a separate action involving the Receiver and Pennsylvania National Mutual Insurance Company (“Penn National”). This is the

Receiver's first request for an extension of these deadlines. The undersigned has communicated with counsel for Penn National, who has consented to the requested extension.

Respectfully submitted,

SMITH | ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC

s/Shanon N. Peake

G. Murrell Smith, Jr. (S.C. Bar # 66263)

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ATTORNEYS FOR RESPONDENT

December 5, 2022.