

**RECEIVED**

**Mar 27 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
In the Court of Common Pleas for the Sixteenth Judicial Circuit

The Honorable William A. McKinnon, Circuit Court Judge

Appellate Case No. 2022-001510

Francine Steineman.....Respondent,

v.

Meridian Security Insurance Company .....Appellant.

**APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND  
SERVE ITS INITIAL REPLY BRIEF AND DESIGNATION OF MATTER**

M. Dawes Cooke, Jr., Esq. (S.C. #1376)  
John W. Fletcher, Esq. (S.C. #69550)  
BARNWELL WHALEY PATTERSON &  
HELMS, LLC  
211 King Street, Suite 300 (29401)  
PO Drawer H  
Charleston, SC 29402  
Phone: (843) 577-7700 Fax: (843) 577-7708  
*Counsel for Appellant Meridian Security  
Insurance Company*

**APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND  
SERVE ITS INITIAL BRIEF AND DESIGNATION OF MATTER**

AND NOW COMES Appellant Meridian Security Insurance Company (“Meridian”), by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days additional time to file and serve its Initial Reply Brief and Designation of Matter.

1. Presently, in accordance with Rule 208(a)(3), the deadline for Meridian’s Initial Reply Brief and Designation of Matter is Friday, March 31, 2023.

2. Appellant Meridian’s counsel requires a short extension of time to file and serve its Initial Reply Brief and Designation of Matter.

3. Specifically, Appellant Meridian respectfully requests that the Court extend this deadline by 14 days, until April 14, 2023.

4. Appellant Meridian believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon any party.

5. This is Meridian's first request for an extension to file its Initial Reply Brief and Designation of matter.

6. Counsel for Respondent Francine Steineman has graciously consented to the relief requested herein.

WHEREFORE, for all of the foregoing reasons, Appellant Meridian Security Insurance Company moves this Honorable Court to grant it an additional extension of 14 days to file and serve its Initial Reply Brief and Designation of Matter. With the requested extension of time, the new deadline for filing and serving Respondent Meridian's Initial Reply Brief and Designation of Matter will be April 14, 2023. Additionally, Respondent Meridian respectfully requests that the Court hold its present deadline for the service and filing of Meridian's Initial Reply Brief and Designation of Matter in abeyance until it acts upon this Motion.

March 27 2023

BARNWELL WHALEY PATTERSON &  
HELMS, LLC

By: 

M. Dawes Cooke, Jr., Esq. (S.C. #1376)

John W. Fletcher, Esq. (S.C. #69550)

211 King Street, Suite 300 (29401)

PO Drawer H

Charleston, SC 29402

Phone: (843) 577-7700 Fax: (843) 577-7708

***Counsel for Appellant Meridian Security  
Insurance Company***

RECEIVED

Mar 27 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM YORK COUNTY  
In the Court of Common Pleas for the Sixteenth Judicial Circuit

The Honorable William A. McKinnon, Circuit Court Judge

Appellate Case No. 2022-001510

Francine Steineman.....Respondent,

v.

Meridian Security Insurance Company .....Appellant.

PROOF OF SERVICE


I certify that I have served the APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE ITS INITIAL REPLY BRIEF AND DESIGNATION OF MATTER on counsel for the above-referenced Respondent by email and by depositing a copy of it in the United States Mail on March 27, 2023, addressed to her attorneys of record:

Bert G. Utsey, Esq. (S.C. #10093)  
Clawson Fagnoli Utsey, LLC  
2 Amherst Street  
Charleston, SC 29403

Stephen G. Vicari, II (S.C. #102395)  
Stewart Law Offices, LLC  
10 Calendar Court, Suite 100  
Post Office Box 6787 (29260)  
Columbia, SC 29206

*Attorneys for Respondent*

BARNWELL WHALEY PATTERSON & HELMS,  
LLC

By:   
M. Dawes Cooke, Jr., Esq. (S.C. #1376)  
John W. Fletcher, Esq. (S.C. #69550)  
211 King Street, Suite 300 (29401)  
PO Drawer H  
Charleston, SC 29402  
Phone: (843) 577-7700 Fax: (843) 577-7708  
*Counsel for Appellant*