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Jun 05 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2018-001108
Civil Action No. 2015-CP-16-00815

Allstate Fire and Casualty Insurance
Company,

Respondent,

v.

Pamela Goodwin,

Appellant.

MOTION FOR EXTENSION

Appellant respectfully moves for an extension of time in which to file and serve her Petition for Rehearing. The motion is not made for the purpose of undue delay, but rather due to the undersigned's workload.

The deadline for filing and serving Appellant's Petition for Rehearing is June 8, 2023. However, with the proposed thirty-day extension, the deadline would be July 10, 2023.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

Angeline M. Larrivee (S.C. #105466)

Roy T. Willey, IV (S.C. #101010)

Eric M. Poulin (S.C. #100209)

Lane D. Jefferies (S.C. #101764)

32 Ann Street

Charleston, SC 29403

(803) 222-2222

Attorneys for Appellant

Williamston, South Carolina

June 5, 2023

Other Counsel of Record:

John Thomas Lay, Jr. (S.C. #64526)

Alfred Johnston Cox (S.C. #9081)

Gallivan, White & Boyd, PA

1201 Main Street, Suite 1200

Columbia, SC 29201

(803) 724-1800 (Mr. Lay)

(803) 779-1833 ext. 1728 (Mr. Cox)

Attorneys for Respondent

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Respondent,

v.

Pamela Goodwin,

Appellant.

PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Appellant's Motion to Extend Time for Filing and Serving her Petition for Rehearing on Respondent by Electronic Mail and by placing a copy in the U.S. Mail, postage prepaid, on June 5, 2023, addressed to Respondent's attorneys of record, John Thomas Lay, Jr. and Alfred Johnston Cox of Gallivan, White & Boyd, PA, 1201 Main Street, Suite 1200, Columbia, SC 29201.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

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REPLY TO ANN STREET OFFICE
TILD@AKIMLAWFIRM.COM

**Transportation & Insurance
Liability Division**

June 5, 2023

VIA U.S. MAIL and E-MAIL ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: *Allstate Fire v. Pamela Goodwin*
Case No.: 2018-001108

Dear Ms. Kitchings:

Attached for filing, please find Appellant's Motion for Extension of Time to File and Serve her Petition for Rehearing, and Proof of Service. A check in the amount of fifty (50) dollars for the filing fee is arriving under separate cover. Please let us know if you need any additional information.

Sincerely,

s/ Angeline Larrivee

Cc: John Thomas Lay, Jr.
Alfred Johnston Cox

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