

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
J. Cordell Maddox, Jr., Circuit Court Judge

Civil Action No. 2020-CP-04-02533

Appellate Case No. 2023-000549

Donegal Insurance,Appellant,

v.

Charles H. Wade,Respondent.

**APPELLANT DONEGAL INSURANCE’S MOTION
FOR EXTENSION OF TIME**

Appellant Donegal Insurance (“Appellant”) respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter, pursuant to Rule 240 of the South Carolina Appellate Court Rules. The current deadline of Appellant’s Initial Brief and Designation of Matter is June 9, 2023. With a thirty (30) day extension, the new deadline for Appellant’s Initial Brief and Designation of Matter would be July 5, 2023. Appellant requests this extension because of scheduling issues and professional obligations of counsel. This is Appellant’s first request for an extension of these deadlines. Appellant requests the current deadline be held in abeyance until this Court issues an Order on this Motion. Furthermore, the thirty (30) day extension

will not prejudice the Respondent or affect his legal rights. Counsel for Respondent consents to this extension request.

Respectfully submitted,

BROWN & BREHMER

By: s/ Karl S. Brehmer

Karl S. Brehmer

L. Darby Plexico, III

Andrew C. Brehmer

1720 Main Street, Suite 201

Post Office Box 7966

Columbia, South Carolina 29202

(803) 771-6600

**ATTORNEY FOR APPELLANT
DONEGAL INSURANCE**

Columbia, South
Carolina June 6, 2023

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Jun 06 2023

SC Court of Appeals

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PROOF OF SERVICE

I certify that a true copy of the Motion for Extension of Time in this case has been served on the following, this 6th day of June 2023, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the May 6, 2022, Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447):

Thomas E. Hite, III, Esq., counsel for Respondent, at t3@hiteandstone.com

RECEIVED

Jun 06 2023

SC Court of Appeals

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June 6, 2023

Reply to: Main Office

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VIA E-FILING AND HAND-DELIVERY:

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Donegal Insurance v. Charles H. Wade
Appellate Case No.: 2023-000549
Our File:

Dear Ms. Kitchings:

Please find enclosed a copy of Appellant Donegal Insurance's Motion for Extension of Time in the above-referenced matter. Hand-delivery herewith is a check for the \$50.00 filing fee. Please let me know if anything further is required from Appellant Donegal Insurance concerning this motion.

With warmest personal regards, I am

Sincerely yours,


Karl S. Brehmer

KSB/acb

cc (via email): Thomas E. Hite, III, Esquire