

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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**Aug 07 2023**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Jean Hofer Toal, Chief Justice

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S.C. SUPREME COURT

Case No. 2020-CP-40-02098  
Appellate Case No. 2023-001079

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

Respondent,

v.

Pennsylvania National Mutual Casualty Insurance Company,

Petitioner.

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**PENN NATIONAL'S RESPONSE TO  
COVIL'S MOTION TO EXPEDITE**

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Appellant Pennsylvania National Mutual Casualty Insurance Company ("Penn National") takes no position on the Motion to Expedite filed by the Receiver for Covil Corporation ("Covil"), and believes that the Court should rule on Penn National's Petition for Writ of Certiorari when it is prepared to do so.

However, Penn National advises the Court that this action does not involve any specific underlying claim where Covil claims to be going without a defense or indemnity. In fact, Penn National is currently defending all underlying claims that Covil has tendered to it and is making indemnity payments on those claims that qualify for coverage.

Respectfully submitted,

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August 7, 2023.