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Aug 28 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Unpublished Opinion No. 2023-UP-200 (S.C. Ct. App. filed May 24, 2023)

Allstate Property and Casualty
Insurance Company,

Respondent,

v.

Natoshia Hamilton and Kenneth
Collins Coogler, Defendants,

of whom NATOSHIA HAMILTON
is the

Petitioner.

MOTION FOR EXTENSION

Petitioner respectfully moves for an extension of time in which to serve and file her Petition for Writ of Certiorari, due to the undersigned's workload. The motion is not made for the purpose of undue delay, but rather for good cause, and Respondent will not be prejudiced if the extension is granted.

The deadline for serving and filing the Petition is August 28, 2023. However, with the proposed ten-day extension, the deadline would be September 7, 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)

32 Ann Street

Charleston, SC 29403

(803) 222-2222

Attorneys for Petitioner

Williamston, South Carolina

August 28, 2023

Other Counsel of Record:

Alfred Johnston Cox (S.C. #9081)

Gallivan, White & Boyd, PA

PO Box 7368

1201 Main Street, Suite 1200

Columbia, SC 29201

(803) 779-1833 ext. 1728

Attorney for Respondent

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of whom NATOSHIA HAMILTON is
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PROOF OF SERVICE

Pursuant to Rule 262(c), SCACR, I certify that I have served Natoshia Hamilton's Motion for Extension of Time in Which to Serve and File her Petition for Writ of Certiorari on Respondent by Electronic Mail on August 28, 2023, addressed to Respondent's attorney of record, Alfred Johnston Cox of Gallivan, White & Boyd, PA.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

POULIN | WILLEY | ANASTOPOULO, LLC

s/ Angeline M. Larrivee

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Attorney for Respondent

Natoshia Hamilton v. Allstate - Motion for Extension for Petition for Cert

1 message

Angeline Larrivee <angeline.larrivee@poulinwilley.com>

Mon, Aug 28, 2023 at 12:22 PM

To: jcox@gwblawfirm.com

Cc: Roy Willey <roy@poulinwilley.com>, Eric Poulin <eric@akimlawfirm.com>, Tom Kyle <tom.kyle@poulinwilley.com>

Bcc: Eric Poulin <eric@akimlawfirm.com>

Dear Mr. Cox:

We hope this letter finds you well. Enclosed for service upon you is Natoshia Hamilton's Motion for Extension of Time in Which to Serve and File her Petition for Writ of Certiorari. Please let us know if you have any questions.

Sincerely,

--

Angeline Larrivee*Staff Attorney***Poulin | Willey | Anastopoulos**

803-222-2222

32 Ann St. Charleston, SC 29403

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73K

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