

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
JUL 11 2013
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Alison Renee Lee, Circuit Court Judge

Case No. 2011-CP-40-1022

Robin E. Otterbacher, Appellant,

v.

Jeremy and Tamara Snyder, individually and as guardians
and parents of Blaze Kendall Snyder, Blaze Kendall Snyder
individually, Selective Insurance Company of America and
Auto-Owners Insurance Company, Defendants,

Of Whom, Selective Insurance Company of America is the, Respondent.

**MOTION FOR EXTENSION
TO FILE INITIAL BRIEF**

The Respondent Selective Insurance Company of America moves this Court
for an additional thirty day extension of time until August 19, 2013, by which to

and
7-19-13
8-19-13

file its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The Respondent's motion is based on the following grounds:


1. The Initial Brief of Respondent Selective Insurance Company of America is currently due to be filed and served on July 19, 2013.

2. The undersigned counsel for the Respondent requires additional time to prepare the Respondent's Initial Brief because of other obligations and deadlines including other briefs due to the Fourth Circuit Court of Appeals, South Carolina Supreme Court and this Court in the next seven days. In addition, the undersigned is scheduled to be in depositions in a construction defect case for five consecutive days beginning July 16, 2013. Finally, the client requires the undersigned to obtain approval of the brief prior to filing, and additional time is needed to accomplish that client requirement.

3. Counsel for the Appellant has consented to the requested extension which is documented by an exchange of emails.

WHEREFORE, the Respondent Selective Insurance Company of America respectfully requests that it be allowed additional time, through and including August 19, 2013, by which to file and serve the its Initial Brief and Designation of Matter to be Included in the Record on Appeal.

DAVIDSON & LINDEMANN, P.A.

BY: 

ANDREW F. LINDEMANN
1611 Devonshire Drive
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Columbia, South Carolina 29202
(803) 806-8222

*Counsel for Respondent
Selective Insurance Company of America*

Columbia, South Carolina

July 11, 2013

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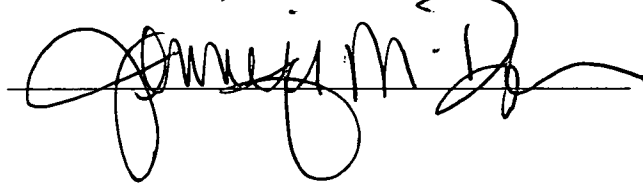
Jeremy and Tamara Snyder, individually and as guardians
and parents of Blaze Kendall Snyder, Blaze Kendall Snyder
individually, Selective Insurance Company of America and
Auto-Owners Insurance Company, Defendants,

Of Whom, Selective Insurance Company of America is the, Respondent.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondent, Selective Insurance Company of America, does hereby certify that service of the **Motion for Extension to File Initial Brief** in the above-captioned matter was made upon Appellant's counsel by placing a copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this the 11th day of July 2013:

Brad D. Hewett, Esquire
Mike Kelly Law Group, LLC
Post Office Box 8113
Columbia, South Carolina 29202

A handwritten signature in black ink, appearing to read "Brad D. Hewett", is written over a horizontal line. The signature is stylized and cursive.

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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†Certified Mediator

July 11, 2013

Writer's Email: alindemann@dml-law.com

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Edgar Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201

RE: Robin E. Otterbacher v. Jeremy and Tamara Snyder, individually and as guardians and parents of Blaze Kendall Snyder, Blaze Kendall Snyder individually, Selective Insurance Company of America and Auto-Owners Insurance Company
Appeal Case Number: 2013-000821
Civil Action Number: 2011-CP-40-1022
Claim Number: 21062140
Our File Number: 307.8676

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension to File Initial Brief** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my courier. I have also enclosed my firm's \$25.00 check for the filing fee.

By copy of this letter, I am serving copies on counsel for the Appellant.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

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cc: Brad D. Hewett, Esquire (*w/ Enclosure*)