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Sep 14 2023

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM GREENVILLE COUNTY
Court Of Common Pleas

The Honorable Robin B. Stilwell, Judicial Circuit Court Judge
Trial Court Case No.: 2017-CP-23-00311

Appellate Case No. 2019-001506

Ex Parte: Trustgard Insurance CompanyAppellant-Respondent,

In Re:

Terence Graham,..... Plaintiff,

v.

Full Logistics, Inc.,Defendant,

Of Whom Terence Graham is theRespondent-Appellant.

**PETITIONER/APPELLANT-RESPONDENT’S MOTION
FOR EXTENSION OF TIME TO FILE/SERVE
PETITION FOR REHEARING AND REHEARING *EN BANC***

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*Attorneys for Appellant-Respondent Trustgard
Insurance Company*

NOW COMES Petitioner/Appellant-Respondent Trustgard Insurance Company, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, on the grounds set forth below, and hereby moves for an extension of fifteen (15) days' time to file/serve their petition for rehearing and rehearing *en banc* in this matter.

The Court's Opinion in this matter was issued September 13, 2023, *see Graham v. Full Logistics, Inc*, Op. No. 6027, establishing September 28, 2023 as the current deadline for Petitioner/Appellant-Respondent to file/serve a Petition for Rehearing and Rehearing *En Banc* pursuant to Rules 219, 221(a), and 240, SCACR. Because of work-related and other time commitments to include out-of-state travel, the undersigned counsel for Petitioner/Appellant-Respondent respectfully requests the Court's allowance of fifteen (15) days additional time to file/serve its Petition for Rehearing and Rehearing *En Banc*. Respectfully, the undersigned submits there is good cause for the Court to grant the relief requested herein, as it is, under the circumstances, a reasonable dispensation, timely sought, consistent with the interests of justice, posing no threat of undue prejudice to any other party.

WHEREFORE, Petitioner/Appellant-Respondent respectfully moves this Honorable Court to grant it an extension of 15 days' time to file/serve its Petition for Rehearing and Rehearing *En Banc*. With the requested extension, the new deadline would be October 13, 2023, by the undersigned's calculations.

Respectfully submitted,



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PROOF OF SERVICE

I certify that on September 14, 2023, I have served the **Petitioner/Appellant-Respondent’s Motion for Extension of Time to File/Serve Petition for Rehearing and Rehearing *En Banc*** by electronic mail – in accordance with § (d)(1) of the Supreme Court’s August 25, 2021, Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, Appellate Case No. 2020-000447 on counsel for the Respondent-Appellant, William F. Barnes, III, Esquire, and Brian T. Smith, Esquire; and Dorothy Holley Hogg, Esquire, sent to their AIS-registered email addresses, as follows: wbarnes@barneslawfirm.com; bsmith@btsmithlaw.com; dhogg@fulcherlaw.com.


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