

**RECEIVED**

**Dec 18 2023**

**SC Court of Appeals**

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

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Appeal from Florence County  
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

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Case No. 2023-CP-21-00483

Appellate No. 2023-001473

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National General Insurance Company,

Appellant,

v.

State Farm Automobile Ins. Co.,

Respondent.

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**MOTION FOR EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF APPELLANT**

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CLEMENT RIVERS, LLP

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Russell G. Hines (SC Bar No. 72100)

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Charleston, South Carolina 29401

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*Attorneys for Appellant*

*National General Insurance Company*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Appellant, National General Insurance Company, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(1), the deadline for Appellant's initial brief and designation of matter is today, December 18, 2023. On account of work-related and other time commitments, Appellant respectfully requests this deadline be extended by 30 days. Respectfully, Appellant believes this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellant moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be January 17, 2024, according to the undersigned's calculations. Further, Appellant respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signed on next page]*

*[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Appellant, Appellate No. 2023-001473]*

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Robert P. Gruber (SC Bar No. 15581)  
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Charleston, South Carolina

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**PROOF OF SERVICE**

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CLEMENT RIVERS, LLP

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*Attorneys for Appellant*

*National General Insurance Company*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on December 18, 2023, by emailing (see attached email) a copy of the same to his counsel of record:

AIKEN BRIDGES ELLIOTT TYLER & SALEEBY, P.A.

James M. Saleeby, Jr., Esquire

[jms@aikenbridges.com](mailto:jms@aikenbridges.com)

*Attorneys for Respondent  
State Farm Automobile Ins. Co.*

Respectfully submitted,

CLEMENT RIVERS, LLP

By: *s/Russell G. Hines*  
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Appellant*

Charleston, South Carolina

December 18, 2023

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, December 18, 2023 3:18 PM  
**To:** jms@aikenbridges.com  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** National General Insurance Company v. State Farm; Appellate Case No. 2023-001473 (CR 230075)  
**Attachments:** Mot. for Ext. -Initial Brief.pdf

Enclosed please find Appellant's Motion for Extension of Time to File/Serve their Initial Brief for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
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