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Jan 17 2024

SC Court of Appeals

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

Appeal from Florence County
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Case No. 2023-CP-21-00483

Appellate No. 2023-001473

National General Insurance Company,

Appellant,

v.

State Farm Automobile Ins. Co.,

Respondent.

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

CLEMENT RIVERS, LLP

Robert P. Gruber (SC Bar No. 15581)

Russell G. Hines (SC Bar No. 72100)

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(843) 720-5488

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, by order of this Court filed December 29, 2023, the deadline for Appellant's initial brief and designation of matter is today, January 17, 2024. 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 February 16, 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 Second 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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Attorneys for Appellant

National General Insurance Company

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellant, hereby certify that the **SECOND MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANT** was served on Respondent on January 17, 2024, 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

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

January 17, 2024

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Wednesday, January 17, 2024 12:15 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: 2nd Motion for Extension - Initial Brief.pdf

Enclosed please find Appellant's Second 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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