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S.C. SUPREME COURT

May 20, 2024

The Honorable Patricia A. Howard  
Clerk, Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

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RE: Motion for Extension to File Petition for a Writ of Certiorari to Review the Decision of the South Carolina Court of Appeals in *Portrait Homes v. Pennsylvania National Mutual Casualty*  
Court of Appeals Case No. 2020-000735  
Lower Court Case No. 2014-CP-08-02757

Dear Ms. Howard:

I will shortly be entering an appearance in the above-referenced matter on behalf of the Appellant. Pursuant to Rule 242 of the South Carolina Appellate Court Rules, Appellant Pennsylvania National Mutual Casualty Insurance Company (“Petitioner”) intends to seek review of the decision of the South Carolina Court of Appeals by filing a petition for a writ of certiorari with this Court. Please accept this letter as Petitioner’s request pursuant to Rule 263(b), SCACR for a 7-day extension in which to file its Petition for a Writ of Certiorari, along with the filing fee in the amount of \$50.00.

On April 24, 2024, the Court of Appeals filed its order denying Petitioner’s petition for rehearing en banc. This is the first request for an extension, and if granted, the new deadline to file a Petition for a Writ of Certiorari would be May 31, 2024.

An extension is necessary to allow Petitioner adequate time to prepare its Petition due to the lengthy procedural history and record of the case, the nature of the arguments, and the complexity of the issues that are the subject of the Petition. In accordance with this Court’s Order dated July 16, 2014, good cause exists to grant the extension.

By copy of this letter, I am hereby serving a copy of the same to counsel of record. Thank you for your consideration of this request.

Sincerely,

/s/ Kirby D. Shealy III

Kirby D. Shealy III

KDS/khm

cc: John Irvin Malone, Jr., Esquire (Via Electronic Mail)  
David L. Brown, Esquire (Via Electronic Mail)  
Stanley Clarence Rodgers, Esquire (Via Electronic Mail)  
John T. Chakeris, Esquire (Via Electronic Mail)  
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