

**RECEIVED**

**May 31 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM JASPER COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

---

Appellate Case No. 2023-001708

---

Jasper County, Respondent-Appellant,

v.

Western Surety Company and Denise Smith, Defendants

Of which Western Surety Company is the Appellant-Respondent.

---

**RESPONDENT-APPELLANT'S MOTION FOR ENLARGEMENT OF TIME  
TO SERVE AND FILE ITS INITIAL BRIEF**

---

Appellant, by and through the undersigned counsel, moves pursuant to Rule 263(b), SCACR, for an order of this Court extending the time to file the Initial Brief and Designation of Matter in this matter. This request is the second extension that counsel has sought in this case and is based off the on-going settlement discussions between the parties. This Motion is not made for purposes of undue delay or any other improper purpose.

Therefore, Appellant requests an Order extending the time to file the Initial Brief and Designation of Matter for Thirty (30) days from the date of such Order and that all timelines be held in abeyance until further Order of this Court.

s/David S. Cobb  
David S. Cobb  
TURNER PADGET  
Post Office Box 22129  
Charleston, South Carolina 29413-2129  
Direct: (843) 576-2803  
Fax: (843) 577-1629  
dcobb@turnerpadget.com  
ATTORNEYS FOR RESPONDENT-  
APPELLANT

May 31, 2024

RECEIVED

May 31 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM JASPER COUNTY  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

---

Appellate Case No. 2023-001708

---

Jasper County, Respondent-Appellant,

v.

Western Surety Company and Denise Smith, Defendants

Of which Western Surety Company is the Appellant-Respondent.

---

PROOF OF SERVICE

---

On May 31, 2024, I emailed a copy of **Respondent-Appellant's Motion for Enlargement of Time to Serve and File its Reply Brief** upon other counsel of record by electronic mail and by depositing a copy with sufficient postage in the United States mail to:

Lauren Nicole Vriesinga  
laurenvriesinga@mvalaw.com

s/Heather Hagen  
Heather Hagen

**DAVID S. COBB**

**Direct Dial: (843) 576-2803**

**Direct Fax: (843) 577-1629**

**dcobb@turnerpadget.com**

May 31, 2024

**by e filing and regular mail:**

Jenny Abbott Kitchings

Court of Appeals Clerk of Court

Post Office Box 11629

Columbia, South Carolina 29211

Re: **Jasper County v. Western Surety Company**

Appellate Docket No.: 2023-001708

TP File No.: 10535.105

Dear Ms. Kitchings:

We enclose Jasper County's Motion for Enlargement of Time to Serve and File its Initial Brief, with attached proof of service. The filing fee is enclosed by regular mail for the costs associated with this request. If you have any questions or need additional information, please call me at your convenience. With kind regards,

TURNER PADGET

s/David S. Cobb

David S. Cobb

DSC/hah

enclosures

cc: counsel of record (by e-mail)