

IN THE STATE OF SOUTH CAROLINA

In the South Carolina Court of Appeals

69538

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

RECEIVED

AUG 23 2013

Case No. 2011-CP-42-02965

SC Court of Appeals

Progressive Northern Insurance Company..... Appellant,

v.

Stanley K. Medlock, Corey K. Medlock and The Standard  
Fire Insurance Company, ..... Defendants,

Of Whom

Stanley K. Medlock and Corey K. Medlock..... Respondents.

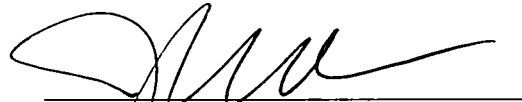
**MOTION FOR EXTENSION OF TIME**

Appellant, Progressive Northern Insurance Company, through its undersigned attorneys, hereby respectfully moves for a ten (10) day extension of time to serve and file its Reply Brief and Designation of Matter until September 9, 2013. Presently, Progressive Northern Insurance Company's Reply Brief and Designation of Matter are due on August 30, 2013. This motion is based upon conflicts with other legal matters between the due date and date of service of the Initial Brief and Designation of Matter concerning cases being handled by counsel for Progressive Northern Insurance Company. The conflicts are the undersigned counsel is scheduled for five separate non-jury motion hearings in Richland, Beaufort and Orangeburg Counties, , has a Reply Brief due in

another matter pending before this court on the same due date of August 30, 2013 and will be traveling to and participating in the mediation of a complex bad faith lawsuit in Charleston County. Therefore counsel respectfully requests a ten (10) day extension to file its Reply Brief and Designation of Matter.

Counsel has consulted with Attorney for Respondent's and he has consent to this request for an extension of time.

August 23, 2013



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J.R. Murphy, Esquire  
Murphy & Grantland, P.A.  
P.O. Box 6648  
Columbia, SC 29260  
(803) 782-4100  
Attorney for Appellant

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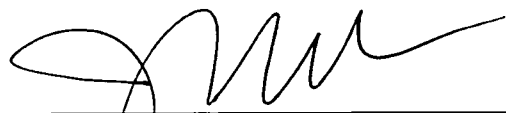
Stanley K. Medlock and Corey K. Medlock..... Respondents.

**PROOF OF SERVICE**

I certify that I have served the Appellant's Motion for Extension of Time on Stanley K. Medlock, Corey K. Medlock and the Standard Fire Insurance Company by depositing a copy of it in the United States Mail, postage prepaid, on August 23, 2013, addressed to their attorneys of record:

Brian A. Martin, Esquire  
Martin & Davis, LLC  
212 Trade Street  
Greer, SC 29651

William P. Davis, Esquire  
Baker, Ravenel & Bender, LLP  
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MURPHY & GRANTLAND, P.A.

J. R. Murphy  
Direct dial 803-454-1231  
jrmurphy@murphygrantland.com

August 23, 2013

**HAND DELIVERED**

Jenny A. Kitchings  
South Carolina Court of Appeals  
1205 Pendleton St.  
P.O. Box 11629  
Columbia, SC 29211

Re: Progressive Northern Insurance Company vs. Stanley K. Medlock, Corey K. Medlock  
and The Standard Fire Ins. Co.  
Civil Action No.: 2011-CP-42-02965  
Claim No.: 10-5041541  
Date of Loss: 10/09/10  
Our File No.: 1115-2016

Dear Ms. Kitchings:

Enclosed please find herewith for filing with the Court the original and nine (9) copies of Appellants Motion for Extension of Time in the above-referenced matter. I would appreciate your filing the original and returning the clocked copies to me by individual delivering same.

By copy of this letter I am serving same on opposing counsel.

With warm personal regards, I am

Sincerely yours,



J. R. Murphy

JRM/sb  
Enclosures

cc: Brian A. Martin, Esquire  
William P. Davis, Esquire  
James A. Dodrill, Esquire (via email)

**RECEIVED**

AUG 23 2013

**SC Court of Appeals**

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