

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA COURT OF COMMON PLEAS FOR  
JASPER COUNTY  
Carmen T. Mullen, Circuit Court Judge

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Appellate Case No. 2023-001708

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Jasper County,

Respondent-Appellant,

v.

Western Surety Company and Denise Smith,

Defendants,

Of which Western Surety Company is the Appellant-Respondent.

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**WESTERN SURETY COMPANY'S MOTION FOR EXTENSION OF TIME**

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Pursuant to South Carolina Appellate Court Rule 240, Appellant-Respondent Western Surety Company ("Western Surety") hereby moves for an extension of time in which to serve and file Western Surety's Reply Brief in reply to Respondent-Appellant Jasper County's Initial Brief in this matter. Western Surety requests an extension of twenty (20) days to file its Reply Brief, which is currently due on July 13, 2024<sup>1</sup>. This is Western Surety's first request for an extension of time to file its Reply Brief.

The grounds for this motion are that other impending professional matters and obligations have created a need for additional time to prepare Western Surety's Reply Brief. The requested

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<sup>1</sup> Ten days from the Jasper County's filing of its Initial Brief on July 3, 2024, falls on Saturday, July 13, 2024. See S.C.A.C.R. 208(a)(3).

twenty-day extension will not prejudice the rights of any party. Granting this motion would require Western Surety's Reply Brief to be served and filed with the Court on or before August 2, 2024.

For the foregoing reasons, Western Surety respectfully requests a twenty-day extension to serve and file its Reply Brief until August 2, 2024.

Respectfully submitted,

*s/Daniel R. Fuerst*

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*Attorneys for Western Surety Company*

July 8, 2024

Charleston, South Carolina

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**PROOF OF SERVICE**

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This is to certify that I have this day served counsel for the Respondent-Appellant in the foregoing matter with a copy of *Western Surety Company's Motion for Extension of Time* via electronic mail only, addressed as follows:

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**(SIGNATURE BLOCK ON FOLLOWING PAGE)**

*s/Daniel R. Fuerst*

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July 8, 2024

Charleston, South Carolina