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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Jean H. Toal, Circuit Court Judge

Case No. 2020-CP-40-02098

Appellate Case No. 2024-000674

Covil Corporation, by and through its duly appointed Receiver, Peter D. Protopapas, Respondent,

v.

Pennsylvania National Mutual Casualty Insurance Company; Sam J. Crain & Co., Inc; and South Carolina Property and Casualty Insurance Guaranty Association,..... Defendants,

Of which Pennsylvania National Mutual Casualty Insurance Company is theAppellant.

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT’S BRIEF AND DESIGNATION OF MATTER
AND EXCEED PAGE LIMIT**

Respondent Covil Corporation, by and through its Receiver Peter D. Protopapas, hereby moves the Court, pursuant to Rule 240 of the South Carolina Appellate Court Rules, for an extension of time of forty-five days to submit Respondent’s initial brief and designation of matter to the Court. The current deadline of Respondent’s initial brief and designation of matter is July 24, 2024. With a forty-five-day extension, the new deadline for Respondent’s initial brief and designation of matter would be September 6, 2024. Respondent requests this extension because of scheduling issues, professional obligations of counsel, and the number of legal issues involved in this appeal. This is Respondent’s first request for an extension of these deadlines. Respondent requests the current deadline be held in abeyance until this Court issues an order on this motion.

Further, pursuant to Appellant's Unopposed Motion for Leave to Exceed Page Limit, Respondent also requests this Court grant leave to file a brief in excess of fifty pages but not to exceed eighty pages.

Counsel for Appellant consents to this request.

Respectfully submitted,

SMITH ROBINSON HOLLER DUBOSE
AND MORGAN, LLC

By: /s/Shanon N. Peake
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Attorneys for Respondents Covil Corporation, by and through its Receiver, Peter D. Protopapas; and Peter D. Protopapas, in his capacity as Receiver for Covil Corporation

Dated: July 19, 2024.