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**Sep 12 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

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Case No. 2020-CP-40-02098  
Appellate Case No. 2024-000674

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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 the Appellant.

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APPELLANT'S UNOPPOSED MOTION FOR AN  
EXTENSION OF TIME TO FILE A REPLY BRIEF AND  
FOR LEAVE TO EXCEED PAGE LIMIT

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Appellant Pennsylvania National Mutual Casualty Insurance Company, by and through its undersigned counsel, and pursuant to Rules 208, 240, and 263 of the South Carolina Appellate Court Rules, hereby moves this Court for an Order granting (1) an extension of time to file its Reply Brief, and (2) leave to file a Reply Brief that exceeds the page limitation.

This appeal arises from a complex insurance coverage case arising from underlying asbestos litigation, with an extensive procedural and factual background. Notably, there are ten orders from the circuit court currently under appeal, including the trial court's final order that is 102 pages long. Given the extensive factual record and the numerous, intricate legal issues, Appellant's Initial Brief was sixty-seven pages, and Respondent's was seventy-six pages.

Appellant respectfully requests leave to file a Reply Brief exceeding the twenty-five-page limitation set by Rule 208(b)(5), SCACR, but not to exceed forty pages. This additional length is necessary to comprehensively and adequately address all matters involved in this appeal and to respond fully to the issues raised in Respondent's seventy-six-page brief.

Appellant further requests a fifteen-day extension in which to file its Reply Brief. If granted, the new due date for Appellant's Reply Brief would be October 1, 2024. An extension is requested to ensure that Appellant has adequate time to prepare its Reply Brief, considering the length and complexity of issues addressed in Respondent's Initial Brief. This will be Appellant's first extension of time requested regarding its Reply Brief.

Appellant's counsel has conferred with Respondent's counsel prior to filing this motion and is informed that Respondent consents to the relief requested herein.

Respectfully submitted,

s/ Kirby D. Shealy III

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*Attorneys for Appellant Pennsylvania National Mutual Casualty Insurance Co.*

September 12, 2024.

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Of which Pennsylvania National  
Mutual Casualty Insurance Company  
is the Appellant.

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PROOF OF SERVICE

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I certify that I have served Appellant's Unopposed Motion for An Extension of Time to File a Reply Brief and For Leave to Exceed Page Limit by e-mailing copies of same via electronic mail only to counsel at the following e-mail address on September 12, 2024, addressed to attorneys of record:

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