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Mar 11 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

G.D. Morgan, Jr., Circuit Court Judge

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Case No.: 2024-CP-23-01585

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Appellate Case No.: 2024-001864

Thomas Carswell, Jr.,

Petitioner,

v.

John Doe, an unidentified  
motorist,

Respondent,

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**MOTION FOR EXTENSION OF TIME TO FILE AND SERVE REPLY  
BRIEF**

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Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, counsel for Petitioner Thomas Carswell, Jr., hereby moves for an extension of time of thirty (30) days to file and serve its Reply Brief on the respondent in the above-referenced case. To date, Petitioner has not requested an extension of time to file his Reply. Petitioner's counsel files this motion seeking an extension because Petitioner's counsel has been out of country the last nine days and needs additional time to brief his Reply. Respondent's counsel has graciously consented to this request. Petitioner's counsel therefore respectfully requests an extension of time to file his Reply Brief until April 14, 2025.

Respectfully submitted,

*/s/Sam Tooker*

Samuel B. Tooker (S.C. Bar # 78999)

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Attorneys for the Appellant Thomas

Carswell, Jr.

Greenville, SC

Date: March 11, 2025

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**PROOF OF SERVICE**

IT IS HEREBY CERTIFIED that a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF in this action was served upon: Susan Drake Dubose, Esq., counsel for Markel American Insurance Company, appearing on behalf of John Doe and Michael T. Coulter, Esq., counsel for Progressive Northern Insurance Company Pursuant to S.C. Code Ann. §38-77-150, via electronic service:

Via Email: SDubose@brblegal.com  
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Company Pursuant to S.C. Code Ann. §38-77-150

*/s/Sam Tooker*

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Date: March 11, 2025