

**RECEIVED**

**Mar 18 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

---

Otis Owens .....Plaintiff/Appellant,

v.

Sheriff Michael Hunt, Matthew Gibson,  
Certain Underwriters at Lloyd’s, London  
subscribing to Policy No. PK 1022716,  
Brit Global Specialty USA d/b/a Brit  
Global, RiverStone Insurance Limited,  
RiverStone International, and Robbie  
Vaughn,

.....Defendants/Respondents.

---

Appellate Case No. 2024-001184

---

**MOTION FOR AN EXTENSION OF TIME TO FILE APPELLANT’S INITIAL BRIEF  
AND DESIGNATION OF MATTER**

---

The Appellant respectfully moves this Court for a 30-day extension to file his Initial Brief and Designation of Matter. The current deadline for filing the Initial Brief is April 2, 2025. However, the undersigned is scheduled for a date-certain trial commencing on March 31, 2025, which is expected to last approximately one week. In addition to preparing for this trial, the undersigned is also engaged in the preparation of multiple trials in both state and federal court and managing several pending appeals with approaching deadlines. While the undersigned is working

diligently to prepare the Appellant's Reply Brief, he believes that the Appellant would benefit from additional time.

For the foregoing reasons, the Appellant respectfully requests a 30-day extension to complete and file his Initial Brief and Designation of Matter. This extension would set the deadline for May 1, 2025.

*s/Joshua T. Hawkins*

Joshua T. Hawkins, S.C. Bar #78470  
Helena L. Jedziniak, S.C. Bar #100825  
Hawkins & Jedziniak, LLC  
1225 South Church Street  
Greenville, South Carolina 29605  
(864) 275-8142 (telephone)  
(864) 752-0911 (facsimile)

Greenville, SC  
March 18, 2025

**Attorneys for Plaintiff/Appellant**

**CC via Electronic Mail:**

William Walton Silverman  
Wood Smith Henning & Berman, LLP  
421 Fayetteville Street, Suite 1100  
Raleigh, NC 27601

Andrew Lindemann  
5 Calendar Court, Suite 202  
Columbia, SC 29260

William H. Davidson, II  
Davidson & Wren, P.A.  
1611 Devonshire Drive (2<sup>nd</sup> Floor)  
Columbia, SC 29202

RECEIVED

Mar 18 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2024-001184

Otis Owens,

.....Appellant,

v.

Sheriff Michael Hunt, Matthew Gibson,  
Certain Underwriters at Lloyd’s, London  
subscribing to Policy No. PK 1022716,  
Brit Global Specialty USA d/b/a Brit  
Global, RiverStone Insurance Limited,  
RiverStone International, and Robbie  
Vaughn, .....

Respondents.

**PROOF OF SERVICE**

I certify that on this date March 18, 2025, I filed the foregoing **Motion for an Extension of Time to File Appellant’s Initial Brief and Designation of Matter** in the above matter, as requested by the Court, via electronic filing, to ctappfilings@sccourts.org. A copy was also served on Respondents via electronic service, addressed to the attorney of record below by email:

**William Walton Silverman**  
**Wood Smith Henning & Berman, LLP**  
**421 Fayetteville Street, Suite 1100**  
**Raleigh, NC 27601**

**Andrew Lindemann  
5 Calendar Court, Suite 202  
Columbia, SC 29260**

**William H. Davidson, II  
Davidson & Wren, P.A.  
1611 Devonshire Drive (2<sup>nd</sup> Floor)  
Columbia, SC 29202**

Hawkins & Jedziniak, LLC



---

Joshua T. Hawkins, S.C. Bar #78470  
Helena L. Jedziniak, SC Bar #100825  
1225 South Church Street  
Greenville, South Carolina 29605  
(864) 275-8142 (telephone)  
josh@hjlsc.com  
helena@hjlsc.com  
Attorneys for Appellant

Greenville, South Carolina  
March 18, 2025