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**Aug 19 2025**

**S.C. SUPREME COURT**

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Case No. 2016-CP-07-2541  
Appellate Case No. 2022-000231  
Supreme Court of South Carolina Appellate Case No. 2025-000436

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**Forum Benefits, LLC, .....Plaintiff-Respondent,**

**v.**

**Brian Bannon and Assured Partners, NL,..... Defendants-Petitioners**

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**PETITIONERS' MOTION FOR EXTENSION OF TIME TO FILE PETITIONERS'  
REPLY BRIEF**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Petitioners request a one-week extension of their reply brief deadline based in part on the fact that Respondent has improperly raised new arguments for the first time on appeal (even noting that “Petitioners might contend that Respondents did not raise the estoppel argument below.”) *See* Brief of Respondent, Page 21. Petitioners consented to Respondent obtaining a two-week extension of its response brief deadline. Petitioners assert that a short extension of the reply brief deadline is necessary to properly and fully respond to Respondent’s “new” arguments. This is Petitioners’ first request for an extension. Petitioners recognize the order of the Supreme Court of South Carolina dated July 16, 2014, noting that extensions should not be necessary based on the expectations that the arguments have been fully made to the trial court and Court of Appeals. However, Respondent

has now made new arguments that it has never made before in this case that need to be fully addressed by Petitioners. This will be the only extension necessary for Petitioners to file their reply brief. This motion is also made based on Counsel for Petitioners' personal schedule and time available to research the new issues raised by Respondent.

Counsel for Petitioners has consulted with Counsel for Respondent who has consented to a one-week extension of the reply brief deadline.

WHEREFORE, Petitioners respectfully request that the Court issue an Order granting their request for an extension of 7 days to file their reply brief, up to and including August 28, 2025.

Respectfully submitted,

s/ Jeffrey A. Lehrer  
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