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Aug 28 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

William A. McKinnon, Circuit Court Judge

Appellate Case No. 2025-000860

Ina Shtukar Steinberg,

Appellant,

v.

South Carolina Property and Casualty Insurance
Guaranty Association, as a statutory successor in
interest to St. Johns Insurance, insolvent insurer,

Respondent.

**MOTION FOR EXTENSION OF TIME IN WHICH TO FILE THE
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Counsel for Respondent South Carolina Property and Casualty Insurance Guaranty Association, as a statutory successor in interest to St. Johns Insurance, insolvent insurer, respectfully requests an extension of **thirty (30) days, until October 15, 2025**, in which to file the Initial Brief of Respondent and Designation of Matter in this case. In support of this request, counsel shows:

1. The Initial Brief of Appellant was filed on August 15, 2025. Accordingly, the current deadline of the Initial Brief of Respondent and Designation of Matter is September 15, 2025.
2. This is the first request for an extension of this deadline.

3. Considering their present workload, Respondents' counsel needs additional time to complete their review of Appellant's initial brief, draft Respondent's initial brief, and circulate their initial brief to their client to provide any input before it is finalized. Additionally, undersigned counsel is scheduled to be out of the country from October 3 to October 13, 2025.
4. Counsel makes this request in good faith and not for the purpose of delay.
5. Counsel attempted to obtain Appellant's consent to this request via email on August 22, 2025, and August 27, 2025, and received no response.

WHEREFORE, undersigned counsel for Respondent respectfully requests a thirty (30) day extension, until October 15, 2025, of the deadline to file the Initial Brief of Respondent and Designation of Matter in this case.

Respectfully submitted,

s/Laura R. Baer

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Attorneys for Respondent

August 28, 2025

CERTIFICATE OF SERVICE

I certify that I have served a true and correct copy of the MOTION FOR EXTENSION OF TIME IN WHICH TO FILE THE INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER by electronic means in a manner provided by order of the Supreme Court of South Carolina, on this 28th day of August, 2025, specifically by e-mail delivery to the following:

Ina Shtukar Steinberg, Esquire
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Appellant Pro Se

s/Laura R. Baer

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August 28, 2025