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Nov 03 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY

MASTER IN EQUITY

IN CASE NO. 15-CP-10-6684, THE HONORABLE MIKELL SCARBOROUGH

CASE No. 2025--001339

Zurich American Insurance Company of Illinois,.....Respondent

v.

Palmetto Contract Services, Inc.,.....Appellant

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONDENT'S INITIAL BRIEF**

Respondent, Zurich American Insurance Company of Illinois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from November 6, 2025 to December 6, 2025, to file its Initial Brief. The extension is requested due to Respondent's Counsel Carolyn Blue's undergoing unexpected medical tests and treatment and her being unexpectedly away from the office, so the additional time is needed for Respondent to properly prepare and file its Reply.

Respondent Counsel for Zurich has contacted Appellant Counsel Jefferson Goodwyn, Esq. who represents Appellant Palmetto Contract Services, Inc. who has consented to the thirty day extension in writing.

For the reason stated above, Respondent respectfully requests that the Court grant this Motion for Enlargement of Time to File Respondent's Reply.

Respectfully submitted.

A handwritten signature in blue ink, appearing to read "C. H.", is written above a horizontal line.

Carolyn H. Blue (SC Bar # 68506)
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Attorney for Respondent

Dated this 30 Day of October 2025

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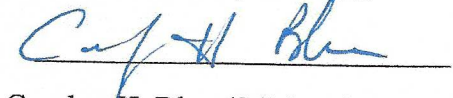
Zurich American Insurance Company of Illinois,.....Respondent

v.

Palmetto Contract Services, Inc.,.....Appellant

PROOF OF SERVICE

I certify that I have served the **Motion for Enlargement of Time to File Respondent's Initial Brief**, by depositing copy of it in the United States Mail, postage prepaid on October 30, 2025, 2018, addressed to Jefferson Goodwyn, Esquire at 2309 Devine Street Columbia, SC 29205



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Attorney for Respondent
Dated this 30th Day of October 2025

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