

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 Illionois (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.

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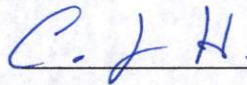
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SC Court of Appeals

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.



Carolyn H. Blue (SC Bar # 68506)
Larry D. Cohen, LLC
Attorneys At Law
PO Box 30547
Charleston, SC 29417
Tel: (843) 225-4445
Fax: (843) 225-2009
E-Mail: Carolyn.blue@ymail.com

Attorney for Respondent

Dated this 30 Day of October 2025

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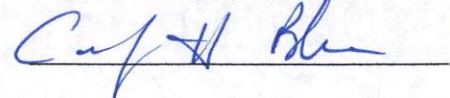
Zurich American Insurance Company of Illinois,.....Respondent

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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PO Box 30547
Charleston, SC 29417
Tel: (843) 225-4445
Fax: (843) 225-2009
E-Mail: Carolyn.blue@ymail.com

Attorney for Respondent

Dated this 30th Day of October 2025

LARRY D. COHEN, LLC
Attorneys at Law
Post Office Box 30547
Charleston, S.C. 29417

Telephone (843) 225-4445
Facsimile (843) 225-2009

Larry D. Cohen *▼
Debra L. Redman ♦▼
Carolyn H. Blue (Of Counsel) +

* Member SC, FL, GA & TX
▼ ♦ Member SC & TX Bars
+ Member SC & Florida Bars

▼ TX- inactive; + FL- inactive

October 29, 2025

Via US Priority Mail

Ms. Jenny Abbott Kitchings, Esq.
Clerk of Court
South Carolina Court Of Appeals
PO Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

Re: Zurich American Insurance Company of Illinois, Respondent
v
Palmetto Contract Services, Inc., Appellant
Appellate Case: 2025-0011339

Dear Ms. Kitchings:

Please find enclosed our law firm's check number 7698 in the amount of \$50.00 for Respondent's Unopposed Motion for Enlargement of Time along with the Motion and Certificate of Service for the Motion to be filed with the Court.

Please return a file-stamped copy of our receipt for the motion fee in the enclosed self-addressed stamped envelope as well as a time stamped copy of the motion. Our client will not reimburse us unless we have a receipt for the Court's motion fee.

Thank you for your attention to this matter. If you have any questions in this matter, please contact either Larry Cohen or myself.

Sincerely,



Carolyn H. Blue

Jenny Abbott Kitchings, Clerk of SC Court of Appeals Letter
Re: Unopposed Motion for Enlargement of Time
Appellate Case: 2025-0011339
October 29, 2025

Jefferson Goodwyn, Esq.
The Goodwyn Law Firm
2309 Devine Street
Columbia, SC 29205

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