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Dec 01 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

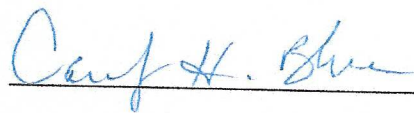
**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONDENT'S INITIAL BRIEF**

Respondent, Zurich American Insurance Company of Illinois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from December 8, 2025 to January 7, 2025, to file its Initial Brief. The extension is requested due to Respondent's Counsel Carolyn Blue's undergoing unexpected medical tests in November 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 reasons 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 26th Day of November 2025

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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 November 26, 2025, addressed to Jefferson Goodwyn, Esquire at 2309 Devine Street Columbia, SC 29205



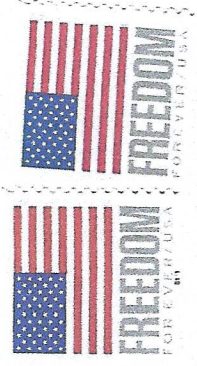
Carolyn H. Blue (SC Bar # 68506)
Larry D. Cohen, LLC
Attorneys At Law
PO Box 30547
Charleston, SC 29417
Tel: (843) 225-4445
Fax: (843) 225-2009
E-Mail: Carolyn.blue@ymail.com

Attorney for Respondent

Dated this 26th Day of November 2025

Larry D. Cohen, LLC (Ct. of Appeals)
Attorneys At Law
Post Office Box 30547
Charleston, SC 29417

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Attorneys At Law
Post Office 30547
Charleston, SC 29417



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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

November 26, 2025

Via U.S. Priority Mail
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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 7716 for \$50 along with Respondent's Unopposed Motion for Enlargement of Time to be filed with the Court.

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

Thank you for your attention to this matter. If you have any questions, please contact our office.

Sincerely,



Carolyn H. Blue,

CHB:lom

Letter to The Honorable Jenny Abbott Kitchings
Re: Zurich American Insurance Company of Illinois v. Palmetto Contract Services, Inc.,
November 26, 2025

Enclosures

cc: Jefferson Goodwyn, Esquire
The Goodwyn Law Firm
2309 Devine Street
Columbia, SC 29205
w/ enclosures