

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Jan 27 2026

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

S.C. SUPREME COURT

Brian M. Gibbons, Circuit Court Judge

Appellate Case No. 2025-000943

Alexis JonesRespondent,

v.

Progressive Northern Insurance Company Petitioner.

MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF

COME NOW, the American Property Casualty Insurance Association (“APCIA”), and moves this Court, pursuant to Rule 213, SCACR, for leave to file an amicus brief in the above-captioned matter, currently pending before this Court. For the reasons set forth hereinafter, APCIA maintains it has sufficient interests in the matter pending before the Court that leave to file an Amicus Brief is warranted under the circumstances.

APCIA is a national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA’s member companies represent 66% of the overall U.S. property-casualty insurance market. On issues of importance to the insurance industry and marketplace, APCIA advocates sound public policies on behalf of its members and their

policyholders in legislative and regulatory forums at the federal and state levels, and submits amicus briefs in significant cases before federal and state courts.

Amicus' brief will assist the Court by providing a broader perspective addressing the implications of a ruling in Respondent's favor on the auto insurance industry in South Carolina.

RELIEF REQUESTED

APCIA believes the issue pending before this Court, and the Court's ruling on the same, has the potential to significantly impact the business interests of its members, as well as the interests of South Carolina businesses and citizens generally. APCIA respectfully requests this Court exercise its discretion and grant leave for it to file an Amicus Brief for the Court's consideration. The proposed Brief of Amici Curiae is attached hereto as **Exhibit A**.

Respectfully Submitted,

s/ A. Johnston Cox

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