

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
CIRCUIT COURT

Mikell R. Scarborough, Master-in-Equity

Case No. 2015-CP-10-06684
Appellate Case No. 2025-001339

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

v.

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

MOTION TO FILE OUT OF TIME

Appellant hereby moves to file its Record on Appeal that was currently due June 19, 2026 out of time and to accept the response being filed contemporaneously with this motion as timely. This motion is based on counsel for appellant's busy deposition and motions schedule and previously planned days off.

GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr. (73789)

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jgoodwyn@goodwynlaw.com

Attorney for Appellant

Columbia, South Carolina
June 19, 2026

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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Circuit Court

APPEAL FROM CHARLESTON CIRCUIT COURT

Mikell Scarborough, Circuit Court Judge

Circuit Court Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339

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SC Court of Appeals

Palmetto Contract Services, Inc.Appellant,

v.

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

PROOF OF SERVICE

I certify that I have served a copy of **Appellant's Motion to File Out of Time**, on the following via email address and facsimile on June 19, 2026.

Larry D. Cohen, Esquire Larry D. Cohen, LLC ldcohen@ldcohenlaw.com	Carolyn H. Blue, Esquire carolyn.blue@ymail.com
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GOODWYN LAW FIRM, LLC

/s/ T. JEFF GOODWYN, JR.

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Attorney for Appellant

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Jefferson D. Turnipseed**

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** Of Counsel

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June 19, 2026

VIA E-FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: *Palmetto Contract Services, Inc. v Zurich American Insurance Company of Illinois*
Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339
Our File No.: 3000-00691

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the **Appellant's Motion to File Out of Time** for filing in connection with the above-referenced matter. The \$50.00 filing fee has been placed in today's mail.

I have copied all interested parties with a copy of this letter as evidenced below.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ T. JEFF GOODWYN, JR.

T. Jeff Goodwyn, Jr.

TJG:cnc

cc: Carolyn H. Blue, Esquire
Larry D. Cohen, Esquire
(all via email)

Goodwyn Law Firm, LLC

2309 Devine Street
Columbia, S.C. 29205

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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