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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SALUDA COUNTY
In the Court of Common Pleas
Donald B. Hocker, Circuit Court Judge

Circuit Court Case No. 2024CP4100087
Appellate Case No. 2026-000356

Truetta Cyrus, Individually and as Duly Appointed Personal Representative and Administrator
of the Estate of Timothy S. CyrusAppellant,

v.

Progressive Northern Insurance Company.....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 240 of the South Carolina Rules of Appellate Procedure, Respondent Progressive Northern Insurance Company (“Respondent”) hereby moves for an extension of thirty (30) days additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondent’s initial brief and designation of matter is July 29, 2026. Respondent respectfully request that this deadline be extended by thirty (30) days as counsel for Respondent is scheduled to be out of the country during the month of July 2026 attending multi-day conferences in Prague, Czech Republic and in Lisbon, Portugal as President of the Association of Defense Trial Attorneys (sister organization to DRI,

FDCC and IADC) and preplanned family vacation in Europe. Further, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon the Appellant.

Counsel for Respondent has consulted with counsel for the Appellant who graciously consents to the requested extension of time.

WHEREFORE, Respondent move this Honorable Court to grant it an extension of thirty (30) days additional time to file/serve its response brief and designation of matter. With the extension requested herein, the new deadline for filing/serving Respondent's response brief and designation of matter would be August 28, 2026, according to the undersigned's calculations.

Respectfully submitted,

s/ A. Johnston Cox

A. Johnston Cox (SC Bar No. 9081)

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*Attorney for Respondent Progressive Northern
Insurance Company*

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PROOF OF SERVICE

I hereby certify that the within **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER** has been served upon all counsel of record
at the primary e-mail address listed in the Attorney Information System (AIS), this 1st day of July, 2026:

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