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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

Patrick Cleburne Fant, III, Circuit Court Judge

Appellate Case No. 2026-001312

Joanne Costello.Appellant,

v.

State Farm Mutual Insurance Company Respondent,

**MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL**

Appellant Joanne Costello hereby moves pursuant to Rule 263(b), SCACR for a thirty-day extension, to November 10, 2026, of the time in which to serve and file Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension as Counsel has had numerous personal and professional obligations in the last several weeks and needs additional time to fully prepare the initial brief and designation of matter.

WHEREFORE, Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days, to November 10, 2026.

<<signature page to follow>>

October 2, 2026

s/ Christina M. Brown

William R. Padget (SC Bar #72579)
Christina M. Brown (SC Bar #104085)
HHP LAW GROUP, LLC
2020 Assembly Street
Columbia, South Carolina 29201
T: (803) 400-8277
Attorneys for Appellant

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Patrick Cleburne Fant, III, Circuit Court Judge

Appellate Case No. 2026-001312

Joanne CostelloAppellant,

v.

State Farm Mutual Insurance Company Respondent,

Cassiopia Rhoads Respondent-Appellant,

v.

Aiken County Sheriff's Office Appellant-Respondent.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024), the undersigned employee of the HHP Law Group, LLC, counsel for the Respondent-Appellant, does hereby certify that service of the *Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter to be Included in Record on Appeal* in the above-captioned matter was made upon all counsel of record by email on this 2nd day of October, 2026 as follows:

Timothy A. Domin (S.C. Bar # 65264)
Clawson and Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492-8144
Phone: 843-577-2026
Email: tdomin@cslaw.com



Ashley Cashdollar, Paralegal



HHP LAW GROUP

Christina M. Brown, Esq.
Attorney at Law
christina@hhplawgroup.com

October 2, 2026

Via Electronic Mail Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina court of Appeals
Email: ctappfilings@sccourts.org

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SC Court of Appeals

**RE: MOTION FOR EXTENSION TO FILE INITIAL BRIEF &
DESIGNATION OF MATTER**

Joanne Costello et al. v. State Farm Mutual Insurance Company
Appellate Case No.: 2026-001312
Lower Court Case No.: 2024-CP-29-00003

Dear Ms. Kitchings,

Enclosed and for filing, please find the *Motion for Extension of Time to Serve and File Initial Brief and Designation of Matter to be Included in Record on Appeal and Proof of Service* in connection with the above-referenced matter.

Our firm's check in the amount of \$50.00 for the filing fee will be hand delivered to the Court this afternoon.

Should you have any questions or require any additional information, please do not hesitate to contact our office directly.

Sincerely,

Christina Brown, Esq.
Attorney for Appellant

Enclosure(s): *as stated*

cc: Bill Padget, Esq. (*via email only*)
Timothy Domin, Esq. (*via email only*)

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