

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC 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

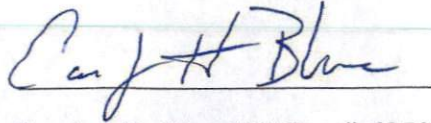
**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO FILE RESPONDENT'S FINAL BRIEF**

Respondent, Zurich American Insurance Company of Illinois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from October 9, 2026 to November 9, 2026, to file its Final Brief. The extension is requested due to Respondent's Counsel unexpected hearings and caseload in October, so the additional time is needed for Respondent to properly prepare and file its Brief.

Respondent Counsel for Zurich has contacted Appellant Counsel Jefferson Goodwyn, Esq. who represents Appellant Palmetto Contract Services, Inc. Mr. Goodwyn has responded via email that he consents to Respondent's legal counsel request.

For the reasons stated above, Respondent respectfully requests that the Court grant this Motion for Enlargement of Time to File Respondent's Final Brief.

Respectfully submitted.

A handwritten signature in blue ink, appearing to read "Carolyn H. Blue", written over a horizontal line.

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 6th Day of October 2025

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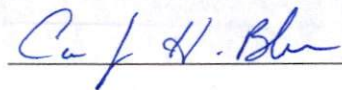
Zurich American Insurance Company of Illinois,.....Respondent

v.

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

PROOF OF SERVICE

I certify that I have served the **Motion for Enlargement of Time to File Respondent's Final Brief**, by email to Jefferson Goodwyn, Esquire.



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 6th Day of October 2026

LARRY D. COHEN, LLC
Attorneys at Law
Post Office Box 30547
Charleston, S.C. 29417

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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

October 6, 2026

Via email and USPS First Class Mail:

The Honorable Jenny Abbott Kitchings
Clerk of Court,
South Carolina Court of Appeals
PO Box 116929
Columbia, South Carolina 29211

**Re: Zurich American Insurance Company of Illinois, Respondent v.
Palmetto Contract Services, Inc., Appellant
Appellate Case No. 2025-0011339**

Dear Ms. Kitchings:

Please find enclosed our law firm's check for \$50.00 along with the Respondent's Motion for Enlargement of Time to be filed with the Court.

Please email us with a time stamped copy of this motion. Thank you for your attention to this matter.

If you have any questions concerning this, please feel free to contact me.

Sincerely,



Carolyn H. Blue

CHB/lom
Enclosures

cc: Jefferson Goodwyn, Esq. via email

C

MR LARRY COHEN
Po Box 30547
CHARLESTON SC 29417-0547

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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