

STATE OF SOUTH CAROLINA
In the Court of Appeals

71171

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

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FEB 03 2014

SC Court of Appeals

Case No.: 2011-CP-18-1892

Cynthia D. Bales, Individually and as Personal
Representative of the Estate of Frank R. Bales,
on Behalf of the Estate and Statutory Beneficiaries Appellants,

v.

Buy Right Autos, Inc. and Northbrook Indemnity Co.

Of Whom Northbrook Indemnity Co. is Respondent.

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

The Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal ("Designation of Matter") were filed with this Court on December 9, 2013. Respondent's Initial Brief and Designation of Matter were due on or before January 8, 2014. On December 17, 2013, Respondent's counsel filed with this Court a letter requesting an additional thirty (30) days in which to file its Initial Brief and Designation of Matter. On December 20, 2013, this Court granted that request, making

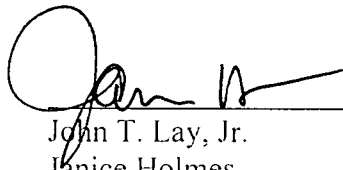
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the new deadline February 7, 2014.

Respondent respectfully requests an additional thirty (30) day extension of time in which to file and serve its Initial Brief and Designation of Matter, which would establish a new deadline of March 10, 2014. Counsel for Respondent requests this additional time due to unforeseen scheduling conflicts and recent travel out of state.

The undersigned counsel for Respondent attempted to confer with counsel for Appellant by e-mail and telephone in an effort to obtain consent for this request. However, Respondent's counsel was unable to reach Appellant's counsel before filing this motion.

Respectfully submitted,



John T. Lay, Jr.
Janice Holmes
Laura W. Jordan
GALLIVAN, WHITE & BOYD, P.A.
Post Office Box 7368
Columbia, South Carolina 29202
Tel: 803.779.1833
Fax: 803.779.1767

ATTORNEYS FOR APPELLANT

Columbia, South Carolina
February 3, 2014

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No.: 2013001225

RECEIVED

FEB 03 2014

SC Court of Appeals

Cynthia D. Bales, Individually and as Personal
Representative of the Estate of Frank R. Bales,
on Behalf of the Estate and Statutory Beneficiaries Appellants,

v.

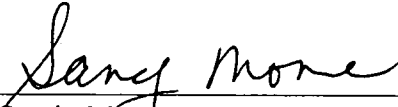
Buy Right Autos, Inc. and Northbrook Indemnity Co.

Of Whom Northbrook Indemnity Co. is Respondent.

PROOF OF SERVICE

I, Sandy Moore, the undersigned employee of Gallivan, White & Boyd, P.A.,
attorneys for Respondent, Northbrook Indemnity Co., do hereby certify that I have served
a copy of the foregoing **Motion for Extension of Time**, in connection with the above-
referenced case by mailing a copy of the same on February 3, 2014, by United States
Mail, postage prepaid, to the following addresses:

Eric Poulin
Anastopoulo Law Firm, LLC
2850 Ashley Phosphate Road, Suite B
Charleston, SC 29418


Sandy Moore

Columbia, South Carolina



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW

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Columbia, South Carolina 29201
Telephone 803.779.1833
Facsimile 803.779.1767
www.GWBlawfirm.com

February 3, 2014

VIA HAND DELIVERY

Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

Re: *Cynthia D. Bales, Individually and as Personal Representative of the Estate of Frank R. Bales, on Behalf of the Estate and Statutory Beneficiaries v. Buy Right Autos, Inc. and Northbrook Indemnity Co. of whom Northbrook Indemnity Co. is Respondent*
Appellate Case No.: 2013-001225
GWB File No.: 8300-54

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of Respondent's Motion for Extension of Time in the above-referenced case along with the filing fee of \$25.00. Please file these documents and return clocked copies to this office via our courier.

By copy of this letter, and as evidenced on the attached Certificate of Service, I am serving counsel of record with the same.

Sincerely,

John T. Lay, Jr.
Direct Dial: 803-724-1800
Email Address: jlay@GWBlawfirm.com

JTL, Jr./sm
Enclosures
Cc: Eric Poulin