

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

Case No. 2013-002133

Stephanie A. Smith, on behalf of herself and all others similarly situated..... Appellant

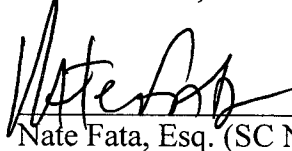
v.

Progressive Halcyon Insurance Company, n/k/a Progressive Direct Insurance Co.,
Progressive Max, and Progressive Casualty Insurance Respondents

SECOND NOTICE OF MOTION AND MOTION FOR EXTENSION
OF TIME TO FILE INITIAL REPLY BRIEF OF APPELLANT

Appellant Stephanie A. Smith moves before this Honorable Court for an extension of thirty days (30) days to file her Initial Reply Brief. Due to co-counsel for the Appellant, Nate Fata, being out of the country from July 19, 2014 through August 4, 2014 counsel for the Appellant does not believe they will have sufficient time to complete the Initial Reply Brief by its current due date of August 7, 2014. Therefore, Appellant is requesting a thirty (30) day extension until September 6, 2014. Appellant appreciates the Court's consideration.

NATE FATA, P.A.



Nate Fata, Esq. (SC No. 009866)
Post Office Box 16620
Surfside Beach, SC 29587
843-238-2676

and

Charles V. Leonard, Esq. (SC No. 64072)
Harris & Leonard, P.A.
4615 Oleander Drive, Suite 202
Myrtle Beach SC 29577

Attorneys for Appellant

June 20, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 23 2014

SC COURT OF APPEALS

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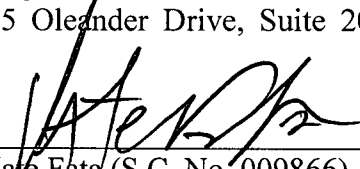
v.

Progressive Halcyon Insurance Company, n/k/a Progressive Direct Insurance Co.,
Progressive Max, and Progressive Casualty Insurance Respondents

PROOF OF SERVICE

I certify that I have served the Second Notice of Motion and Motion For Extension of Time To File Initial Reply Brief of Appellant on Progressive Halcyon Insurance Company n/k/a Progressive Direct Insurance Co., Progressive Max, and Progressive Casualty Insurance by depositing a copy of same in the United States Mail, postage prepaid, on June 20, 2014, addressed to attorneys of record Thomas C. Brittain, Esq., A. Preston Brittain, Esq., The Brittain Law Firm, P.A., 4614 Oleander Drive, Myrtle Beach, SC 29577 and Jeffrey S. Cashdan, Esq. and Zachary A. McEntrye, Esq. King & Spalding, LLP, 1180 Peachtree Street, N.E., Atlanta, GA 20309 and to Charles V. Leonard, Esq. 4615 Oleander Drive, Suite 202, Myrtle Beach, SC 29577.

June 20, 2014



Nate Fata (S.C. No. 009866)
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JUN 23 2014

SC Court of Appeals

VIA U.S. MAIL

June 20, 2014

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

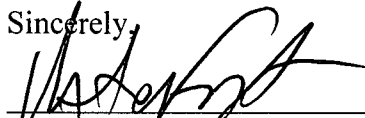
Re: Stephanie A. Smith vs. Progressive Halcyon Insurance
Appellate Case No. 2013-002133

Dear Ms. Kitchings:

Enclosed for filing are an original and six copies of Appellant's Second Notice of Motion and Motion for Extension of Time to File its Initial Reply Brief of Appellant and Proof of Service of same. I enclose a check in the amount of \$25 for the filing fee. Due to my case load and summer vacation, I respectfully request a 30-day extension so that Appellant's Reply Brief is due September 6, 2014.

We appreciate the Court's consideration.

Sincerely,



Nate Fata (009866)

Nate Fata, P.A.

Post Office Box 16620

Surfside Beach, SC 29587

(843) 238-2676

Attorney for Appellant



neopost^M

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