

1

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

APPEAL FROM COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

M 3214

Alison Renee Lee, Presiding Judge

Appellate Case No. 2014-000728

South Carolina Insurance  
Reserve Fund, Respondent,

v.

East Richland County Public Service  
District and Coley Brown, Defendants

Of Whom East Richland County Public Service District is Appellant,

And Coley Brown is a Respondent.

**RECEIVED**

AUG 14 2014

**SC Court of Appeals**

MOTION FOR EXTENSION OF TIME

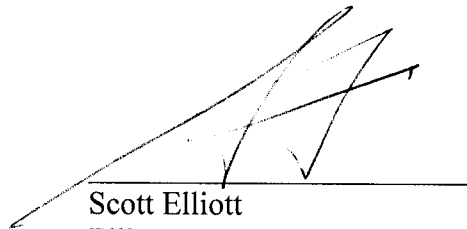
The Appellant, East Richland County Public Service District, by and through its undersigned counsel, hereby moves for an extension of time in which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal in the above-captioned matter. Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal are currently due by August 22, 2014.

Given the press of Appellant counsel's practice, the undersigned hereby respectfully requests an additional thirty (30) day enlargement of time within which to file and serve

Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal. As the 30th day falls on Sunday, Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal would be due by Monday, September 22, 2014.

The undersigned has consulted counsel for South Carolina Insurance Reserve Fund who consented to the motion and counsel for Coley Brown who has no objection to the within motion.

Respectfully submitted, this the 13<sup>th</sup> day of August, 2014, in Columbia, South Carolina.

A handwritten signature in black ink, appearing to read 'Scott Elliott', is written over a horizontal line. The signature is stylized and somewhat abstract.

Scott Elliott  
Elliott & Elliott, P.A.  
1508 Lady Street  
Columbia, SC 29201  
Tel.: (803) 771-0555; Fax: (803) 771-8010

Attorney for Appellant, East Richland  
County Public Service District

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: South Carolina Insurance Reserve Fund v. East Richland County  
Public Service District and Coley Brown  
Case No.: 2011-CP-40-02096  
Appellate Case No. 2014-000728

**RECEIVED**

AUG 14 2014

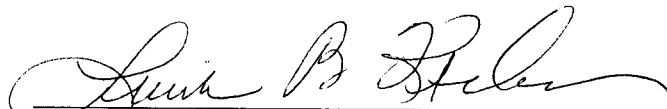
PLEADING: Motion For Extension of Time

**SC Court of Appeals**

PARTIES SERVED: Andrew F. Lindemann, Esquire  
Davidson and Lindemann, PA  
Post Office Box 8568  
Columbia, SC 29202-8568  
[alindemann@dml-law.com](mailto:alindemann@dml-law.com)  
Attorney for Respondent South Carolina Insurance Reserve Fund

Kenneth E. Berger, Esquire  
The Law Office of Kenneth E. Berger, LLC  
5205 Forest Drive, Suite 2  
Columbia, SC 29206  
[kberger@bergerlaw.sc.com](mailto:kberger@bergerlaw.sc.com)  
Attorney for Respondent Coley Brown

DATE SERVED: August 13, 2014

  
Linda B. Kitchens, Legal Assistant

August 13, 2014

ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

1508 Lady Street

COLUMBIA, SOUTH CAROLINA 29201

[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555

FACSIMILE (803) 771-8010

August 13, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

RE: South Carolina Insurance Reserve Fund v. East Richland County Public Service  
District and Coley Brown  
Appellate Case No. 2014-000728

Dear Ms. Kitchings:

Enclosed please find a Motion For Extension of Time filed on behalf of the Appellant in the above captioned matter. I have also enclosed an extra copy of this Motion and Certificate of Service which I would ask you to date stamp and return to me in the self-addressed stamped envelope provided. Last, enclosed is an Elliott & Elliott, P. A. check in the amount of \$25.00 representing the filing fee. By copy of this letter, I am serving all parties of record.

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

Sincerely,

Elliott & Elliott, P.A.

Scott Elliott  
S.C. Bar #1872

SE/lbk  
Enclosures

cc: Andrew F. Linderman, Esquire (w/encl.)  
Kenneth E. Berger, Esquire (w/encl.)

**RECEIVED**

AUG 14 2014

**SC Court of Appeals**

ELLIOTT & ELLIOTT, P.A.  
Attorneys At Law  
1508 Lady Street  
Columbia, SC 29201



The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

**RECEIVED**

AUG 14 2014

SC Court of Appeals

2921101629 8012