

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Edward W. Miller, Circuit Court Judge

Case No. 12-CP-23-6195

Court of Appeals Tracking No.: 2014-000150

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SC Court of Appeals

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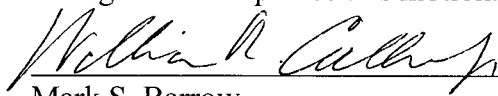
Canal Insurance Company,.....Appellant,

v.

National House Movers, L.L.C.;
Kevin E. Jones; David Black;
Ron Hewes; and Brent Jones.....Respondents.

**MOTION FOR ENLARGEMENT OF TIME
TO FILE AND SERVE INITIAL REPLY BRIEF**

Appellant herewith moves for a ten (10) day enlargement of time for the submission of its initial reply brief. The brief presently is scheduled for submission on September 9, 2014. Appellant requests that the submission be rescheduled for Friday, September 19, 2014. The Respondent consents to this motion. A check for the filing fee accompanies this motion.



Mark S. Barrow
William R. Calhoun, Jr.
Sweeny Wingate & Barrow, P.A.
Post Office Box 12129
Columbia, SC 29211
803-256-2233

ATTORNEYS FOR APPELLANT

Columbia, South Carolina

September 2, 2014

THE STATE OF SOUTH CAROLINA

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Canal Insurance Company,.....Appellant,

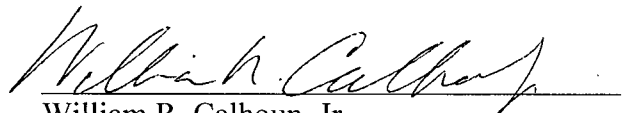
v.

National House Movers, L.L.C.;
Kevin E. Jones; David Black;
Ron Hewes; and Brent Jones.....Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Motion for Enlargement of Time to file and serve its Initial Reply Brief on National Home Movers, L.L.C.; David Black; Ron Hewes; and Brent Jones, by depositing a copy of it in the United States Mail, postage prepaid, on the date annotated below, addressed to their attorney of record, Eugene C. Covington, Jr., Post Office Box 2343, Greenville, S.C. 29602 and have served Kevin E. Jones in the same manner and on the same day by depositing a copy of it in the U.S. Mail, postage prepaid, addressed to his attorney of record, George Brandt, III, 360 East Henry Street, Suite 101, Spartanburg, S.C. 29302.

September 2, 2014



William R. Calhoun, Jr.
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(803) 256-2233

ATTORNEY FOR APPELLANT



SWEENEY WINGATE & BARROW P.A.

September 2, 2014

Reply to: Main Office

William R. Calhoun, Jr.
(803) 256-2233 x7102
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HAND-DELIVERED

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

RE: Canal Insurance Company v. National House Movers, LLC et al.
Case Number: 12-CP-23-6195
Court of Appeals Tracking No.: 2014-000150
Our File: 4193-8329

Dear Ms. Kitchings:

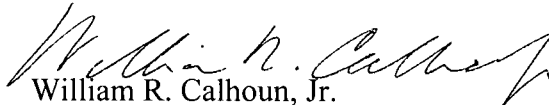
Enclosed are the original and seven copies of Appellant's Motion for Enlargement of Time of 10 days to file and serve its Initial Reply Brief. Respondent's Initial Brief was served by mail on August 25. Appellant's Initial Reply Brief would, without the enlargement of time be due on September 9, given the five-day extension provided by Rule 6(e), SCRCPP. With the requested enlargement the brief would be due on September 19. The Respondent has consented to the requested enlargement.

Enclosed also are a Proof of Service and this firm's check in the amount of \$25 for the filing fee. Please return one stamped copy of each document with the courier who delivered this material.

Should you have any questions or concerns, please do not hesitate to contact me.

Yours truly,

SWEENEY, WINGATE & BARROW, P.A.


William R. Calhoun, Jr.

WRC/naa
Enclosures

cc: George Brandt, III, Esquire, w/enclosure
Eugene C. Covington, Jr., Esquire, w/enclosure

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SC Court of Appeals

S·W·B

SWEENY WINGATE & BARROW P.A.

1515 LADY ST. (29201) ▪ PO BOX 12129 ▪ COLUMBIA, SC 29211

VIA HAND DELIVERY

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

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