

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 10 2014

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable Paul M. Burch, Judicial Circuit Court Judge
Trial Court Case No.: 2013-CP-16-00317

173816

Appellate Case No.: 2014-000626

JONATHAN TEAL AND STACIE TEAL Appellants

-vs.-

MARY ELIZABETH HICKMAN-TEDDER, ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, GOVERNMENT EMPLOYEES INSURANCE COMPANY
AND NATIONWIDE MUTUAL INSURANCE COMPANY Respondents

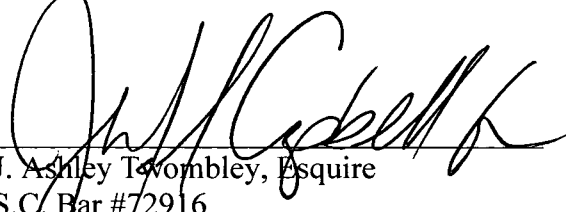
**APPELLANTS' FIRST MOTION FOR EXTENSION
TO FILE INITIAL REPLY BRIEF**

Appellants Initial Reply Brief is currently due October 13, 2014. Due to conflicts in the undersigned counsel's schedule, Appellants respectfully request a ten (10) day extension to file and serve the Initial Reply Brief to the four separate Respondent's Briefs, pursuant to Rule 240, SCACR. This extension would make the Initial Reply Brief due on October 23, 2014. This is Appellants' first request for an extension, and the attorneys for Respondents consent to Appellants' request as evidenced by the attached email correspondence.

Respectfully submitted,

TWENGE + TWOMBLY LAY FIRM

BY:


J. Ashley Twombly, Esquire

S.C. Bar #72916

311 Carteret Street, Beaufort, SC 29902

Telephone: (843) 982-0100

Twombly@twlawfirm.com

ATTORNEYS FOR APPELLANTS

Beaufort, South Carolina

October 8, 2014

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

The Honorable Paul M. Burch, Fourth Judicial Circuit Court Judge
Case No.: 2013-CP-16-0317

Appellate Case No.: 2014-000626

JONATHAN TEAL AND STACIE TEAL..... Appellants

-vs.-

MARY ELIZABETH HICKMAN-TEDDER, ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, GOVERNMENT EMPLOYEES INSURANCE COMPANY
AND NATIONWIDE MUTUAL INSURANCE COMPANY Respondents

CERTIFICATE OF SERVICE

The undersigned, Andrea Smith, hereby avers that she is a Paralegal with TWENGE + TWOMBLEY LAW FIRM, Attorneys for Appellants, and that on the 8th day of October 2014, a true and accurate copy of the attached of Appellants' First Motion for Extension to File Initial Reply Brief was placed in an envelope with first class postage thereon prepaid through the United States Postal Service and mailed to the following:

John T. Lay, Esquire (S.C. Bar #64526)
A. Johnston Cox, Esquire (S.C. Bar #09081)
Janice Holmes, Esquire (S.C. Bar #75038)
GALLIVAN, WHITE & BOYD, P.A.
P.O. Box 7368, Columbia, SC 29202
Telephone: (803) 779-1833
ATTORNEYS FOR RESPONDENT
ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY

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SC Court of Appeals

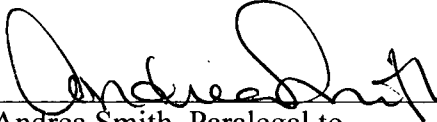
Robert T. King, Esquire (S.C. Bar #066237)
KING, LOVE & SMITH, LLC
P.O. Box 1764, Florence, SC 29503-1764
Telephone: (843) 407-5525
rking@klslawfirm.com
ATTORNEYS FOR RESPONDENT,
GOVERNMENT EMPLOYEES INSURANCE COMPANY

C. Heath Ruffner, Esquire
HARRIS, MCLEOD & RUFFNER
P.O. Box 1449, Cheraw, SC 29520
Telephone: (843) 537-5204
hruffner@hmandrlaw.com
ATTORNEY FOR RESPONDENT,
MARY ELIZABETH HICKMAN-TEDDER

Molly H. Craig, Esquire
Robert H. Hood, Esquire
Deborah H. Sheffield, Of Counsel
HOOD LAW FIRM, LLC
172 Meeting Street, Charleston, SC 29401
Telephone: (843) 577-4435
Molly.craig@hoodlaw.com
bobby.hood@hoodlaw.com
deborah.sheffield@hoodlaw.com
ATTORNEYS FOR RESPONDENT,
MARY ELIZABETH HICKMAN-TEDDER

J. R. Murphy, Esquire
Ashley B. Stratton, Esquire
MURPHY & GRANTLAND, P.A.
P.O. Box 6648, Columbia, SC 29260
Telephone: (803) 782-4100
jrmurphy@murphygrantland.com
astratton@murphygrantland.com
ATTORNEYS FOR RESPONDENT,
NATIONWIDE MUTUAL INSURANCE COMPANY

BY:


Andrea Smith, Paralegal to
TWENGE + TWOMBLY LAW FIRM

Andrea Smith

From: Johnston Cox <jcox@gwblawfirm.com>
Sent: Wednesday, October 08, 2014 11:13 AM
To: Andrea Smith; astratton@murphygrantland.com; deborah.sheffield@hoodlaw.com; Janice Holmes; rking@klslawfirm.com
Cc: Ashley Twombly; Jennifer Campbell; 'jrmurphy@murphygrantland.com'; Molly.craig@hoodlaw.com; Robert.hood@hoodlaw.com; John T. Lay; 'hruffner@hmandrlaw.com'
Subject: RE: Teal v. Hickman Tedder et al. - Extension

I consent.



A. Johnston Cox
Shareholder
jcox@GWBlawfirm.com

Gallivan, White & Boyd P.A.
Office 1201 Main Street | Suite 1200 | Columbia SC 29201
803 724 1728 Direct | 803 779 1833 Main | 803 779 1767 Fax
Mailing Post Office Box 7368 | Columbia SC 29202
vCard | BioURL | Website

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

From: Andrea Smith [<mailto:andrea@twlawfirm.com>]
Sent: Wednesday, October 08, 2014 11:08 AM
To: astratton@murphygrantland.com; deborah.sheffield@hoodlaw.com; Janice Holmes; rking@klslawfirm.com
Cc: Ashley Twombly; Jennifer Campbell; 'jrmurphy@murphygrantland.com'; Molly.craig@hoodlaw.com; Robert.hood@hoodlaw.com; John T. Lay; Johnston Cox; 'hruffner@hmandrlaw.com'
Subject: Teal v. Hickman Tedder et al. - Extension

Dear Ms. Stratton, Ms. Sheffield, Ms. Holmes and Mr. King -

As you may know, Appellants' Reply Brief is due Monday, October 13, 2014, in the referenced matter.

Mr. Twombly is out of the office the rest of this week and would like to obtain a 10 day extension to file the Appellants' Reply Brief.

Therefore, would you please email me and let me know if you are able to consent to Mr. Twombly's request for a short 10 day extension to file Appellants' Reply Brief?

Thank you so much for your consideration.

Andrea Smith

From: Rob King <rking@klslawfirm.com>
Sent: Wednesday, October 08, 2014 11:15 AM
To: Ashley B. Stratton
Cc: Andrea Smith; deborah.sheffield@hoodlaw.com; jholmes@gwblawfirm.com; Ashley Twombley; Jennifer Campbell; J R. MURPHY; Molly.craig@hoodlaw.com; Robert.hood@hoodlaw.com; jlay@gwblawfirm.com; jcox@gwblawfirm.com; hruffner@hmandrlaw.com
Subject: Re: Teal v. Hickman Tedder et al. - Extension

Not a problem.

Rob King

Sent from my iPhone

On Oct 8, 2014, at 11:11 AM, Ashley B. Stratton <AStratton@murphygrantland.com> wrote:

I consent.

<image001.png>

Murphy & Grantland, P.A.

Ashley B. Stratton, Esquire
astratton@murphygrantland.com
Post Office Box 6648
Columbia, South Carolina 29260
803-782-4100 ext. 1241
803-454-1241 dd
803-782-4140 fax
www.murphygrantland.com

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To: Ashley B. Stratton; deborah.sheffield@hoodlaw.com; jholmes@gwblawfirm.com; rking@klslawfirm.com
Cc: Ashley Twombley; Jennifer Campbell; J R. MURPHY; Molly.craig@hoodlaw.com; Robert.hood@hoodlaw.com; jlay@gwblawfirm.com; jcox@gwblawfirm.com; 'hruffner@hmandrlaw.com'
Subject: Teal v. Hickman Tedder et al. - Extension

Dear Ms. Stratton, Ms. Sheffield, Ms. Holmes and Mr. King -

As you may know, Appellants' Reply Brief is due Monday, October 13, 2014, in the referenced matter. Mr. Twombley is out of the office the rest of this week and would like to obtain a 10 day extension to file the Appellants' Reply Brief.

Therefore, would you please email me and let me know if you are able to consent to Mr. Twombley's request for a short 10 day extension to file Appellants' Reply Brief?

Thank you so much for your consideration.

Andrea Smith

From: Ashley B. Stratton <AStratton@murphygrantland.com>
Sent: Wednesday, October 08, 2014 11:10 AM
To: Andrea Smith; deborah.sheffield@hoodlaw.com; jholmes@gwblawfirm.com; rking@klslawfirm.com
Cc: Ashley Twombly; Jennifer Campbell; J R. MURPHY; Molly.craig@hoodlaw.com; Robert.hood@hoodlaw.com; jlay@gwblawfirm.com; jcox@gwblawfirm.com; 'hruffner@hmandrlaw.com'
Subject: RE: Teal v. Hickman Tedder et al. - Extension

I consent.



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Therefore, would you please email me and let me know if you are able to consent to Mr. Twombly's request for a short 10 day extension to file Appellants' Reply Brief?

Thank you so much for your consideration.

Andrea

Andrea Smith
Paralegal to J. Ashley Twombly
Twenge + Twombly Law Firm
311 Carteret Street

Andrea Smith

From: Deborah Sheffield <deborah.sheffield@hoodlaw.com>
Sent: Wednesday, October 08, 2014 12:07 PM
To: Andrea Smith; astratton@murphygrantland.com; jholmes@gwblawfirm.com; rking@klslawfirm.com
Cc: Ashley Twombly; Jennifer Campbell; jrmurphy@murphygrantland.com; Molly Craig; Robert.hood@hoodlaw.com; jlay@gwblawfirm.com; jcox@gwblawfirm.com; hruffner@hmandrlaw.com
Subject: RE: Teal v. Hickman Tedder et al. - Extension

We consent. Deborah Sheffield, Hood Law

From my Android phone on T-Mobile. The first nationwide 4G network.

----- Original message -----

From: Andrea Smith <andrea@twlawfirm.com>
Date: 10/08/2014 11:08 AM (GMT-05:00)
To: astratton@murphygrantland.com, Deborah Sheffield <deborah.sheffield@hoodlaw.com>, jholmes@gwblawfirm.com, rking@klslawfirm.com
Cc: Ashley Twombly <twombly@twlawfirm.com>, Jennifer Campbell <jennifer@twlawfirm.com>, "jrmurphy@murphygrantland.com" <jrmurphy@murphygrantland.com>, Molly Craig <molly.craig@hoodlaw.com>, Robert.hood@hoodlaw.com, jlay@gwblawfirm.com, jcox@gwblawfirm.com, "hruffner@hmandrlaw.com" <hruffner@hmandrlaw.com>
Subject: Teal v. Hickman Tedder et al. - Extension

Dear Ms. Stratton, Ms. Sheffield, Ms. Holmes and Mr. King -

As you may know, Appellants' Reply Brief is due Monday, October 13, 2014, in the referenced matter. Mr. Twombly is out of the office the rest of this week and would like to obtain a 10 day extension to file the Appellants' Reply Brief. Therefore, would you please email me and let me know if you are able to consent to Mr. Twombly's request for a short 10 day extension to file Appellants' Reply Brief? Thank you so much for your consideration.

Andrea

Andrea Smith
Paralegal to J. Ashley Twombly
Twenge + Twombly Law Firm
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WEB:: TWLAWFIRM.COM

J. ASHLEY TWOMBLEY*
KARL D. TWENGE
JENNIFER I. CAMPBELL*

::: LICENSED IN SC + GA
::: OF COUNSEL

October 8, 2014

Via U.S. Mail

The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

**RE: Jonathan Teal and Stacie Teal v. Mary Elizabeth Hickman-Tedder, Allstate Property and Casualty Insurance Company, Government Employees Insurance Company and Nationwide Mutual Insurance Company
Appellate Case No.: 2014-000626**

Dear Ms. Kitchings:

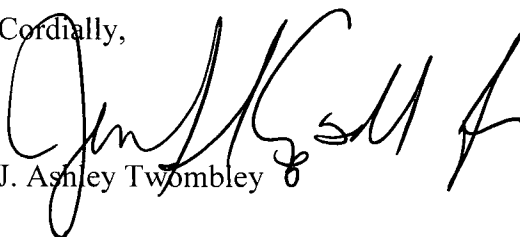
Please find enclosed the original and seven (7) copies of Appellants' First Motion for Extension to File Appellant's Initial Reply Brief in the referenced matter. I would appreciate it if you would file the original and return a clocked copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter, I am serving the same upon all counsel of record.

Thank you for your consideration in this matter. If you have any questions, please do not hesitate to contact me.

With kindest regards, I remain

Cordially,



J. Ashley Twombley

cc: Mr. and Mrs. Jonathan Teal
C. Heath Ruffner, Esquire
Molly H. Craig, Esquire
Robert H. Hood, Esquire
Deborah H. Sheffield, Esquire
J.R. Murphy, Esquire
Ashley B. Stratton, Esquire
Robert T. King, Esquire
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Beaufort, SC 29902**

**The Honorable Jenny Abbot Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211**

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