

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ABBEVILLE COUNTY  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2012-CP-01-00306  
Appellate Case No. 2014-00946

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OCT 07 2014

SC Court of Appeals

73784

Richard Wilson, Michael J. Antoniak, Jr., Marsha L. Antoniak, Anita L. Belton, Prescott Darren Bosler, Johnny Calhoun, Sallie Calhoun, Cynthia Gary, Robert Wayne Gary, Eugene P. Lawton, Jr., Jeanette Norman, James Robert Shirley, Robert W. Spires, Crystal Spires Wiley, Lewis S. Williams, Janie Wiltshire, Benjamin Franklin Wofford, Jr., and Rebecca Hammond Wofford,..... Respondents

v.

LAURA B. WILLIS and JESSE A. DANTICE, individually, and as agents and/or brokers for Southern Risk Insurance Services LLC, Travelers Casualty Insurance Co. of America, Allied Property and Casualty Insurance Co., Peerless Insurance Co., Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost Insurance Co., SOUTHERN RISK INSURANCE SERVICES, LLC, TRAVELERS CASUALTY INSURANCE CO. OF AMERICA, ALLIED PROPERTY AND CASUALTY INSURANCE CO., PEERLESS INSURANCE CO., MONTGOMERY MUTUAL INSURANCE CO., SAFECO INSURANCE CO. OF AMERICA, and FOREMOST INSURANCE CO.,..... Defendants,

Of whom Peerless Insurance Company, Montgomery Mutual Insurance Company, and Safeco Insurance Company of America are..... Appellants.

**MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO RESPONDENTS' BRIEF**

NELSON MULLINS RILEY & SCARBOROUGH, LLP

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Attorneys for Appellants

2nd  
10-14-14

Pursuant to Rules 208(a)(3) and 240 of the South Carolina Appellate Court Rules, Appellants Peerless Insurance Company, Montgomery Mutual Insurance Company, and Safeco Insurance Company of America, request an extension of time of five business days to file their reply to the Initial Brief of Respondents (excluding Laurie Wilson Williams, who filed a separate brief as Respondent, to which the Appellants will reply separately). This is the second request for an extension of time by the Appellants. This request is made due to other court deadlines and to allow for time needed to prepare and file the Appellants' initial Reply Brief. No prejudice will be caused to either party by this extension.

The Respondents' brief was served on September 17, 2014, and the original deadline for Appellants' Reply Brief was September 27, 2014. The Appellants' first request for an extension of time moved that deadline to October 7, 2014. This second request would make the new deadline **October 14, 2014**. We also ask that the Court hold the current deadline in abeyance until an Order is issued on this request.

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Attorneys for Appellants Peerless Insurance Company,  
Montgomery Mutual Insurance Company, and Safeco  
Insurance Company of America.

October 7, 2014  
Columbia, South Carolina .

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Respondent,

v.

LAURA B. WILLIS and JESSE A. DANTICE, individually, and as agents and/or brokers for Southern Risk Insurance Services LLC, Travelers Casualty Insurance Company of America, Allied Property and Casualty Insurance Company, Peerless Insurance Company, Montgomery Mutual Insurance Company, Safeco Insurance Company of America, and Foremost Insurance Company, SOUTHERN RISK INSURANCE SERVICES, LLC, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY, PEERLESS INSURANCE COMPANY, MONTGOMERY MUTUAL INSURANCE COMPANY, SAFECO INSURANCE COMPANY OF AMERICA, AND FOREMOST INSURANCE COMPANY, .....

Defendants,

Of Whom Peerless Insurance Company, Montgomery Mutual Insurance Company, and Safeco Insurance Company of America are.....

Appellants.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Montgomery Mutual Insurance Company, Peerless Insurance Company, and Safeco Insurance Company of America, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellants' Motion for Extension of Time to File Reply to Respondents' Brief

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Lisa P. Whitehurst  
Administrative Assistant

October 7, 2014

# Nelson Mullins

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October 7, 2014

## Hand Delivered

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
The South Carolina Court of Appeals  
1015 Sumter Street – 5th Floor  
Columbia, South Carolina 29201

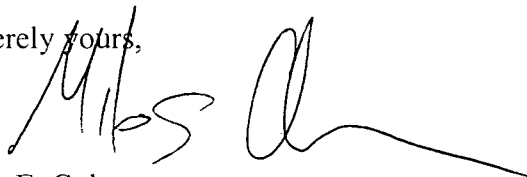
RE: Richard W. Wilson v. Laura B. Willis, and Jesse A. Dantice, et al.  
Civil Action No. 2012-CP-01-306  
Appellate Case No. 2014-00946  
Our File No. 00350/01679

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of the Appellants' motion for an extension of time in which to file their Reply to the Respondents' Brief in the above-captioned matter. In addition, you will also find enclosed the original and seven copies of the Appellants' motion for an extension of time in which to file their Reply to the Brief of Respondent Laurie Williams, also in the above-captioned matter. We would ask that you file the originals and return a clocked-in copy of each motion to us via our courier. Also enclosed are two Firm checks, each in the amount of \$25.00, as the required filing fee for these motions.

With kind regards, I remain

Sincerely yours,



Miles E. Coleman

cc: Thomas E. Hite, Jr., Esquire  
William H. Nicholson III, Esquire  
Mason A. Goldsmith, Esquire  
Elizabeth M. McMillan, Esquire  
Jeffrey C. Kull, Esquire  
D. Larry Kristinik, Esquire  
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Jeffrey A. Lehrer, Esquire

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