

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2011-CP-32-04981
Appellate Case No. 2014-000671

RECEIVED

OCT 30 2014

SC Court of Appeals

74006

Mike Russell, Respondent,

v.

Randolph Gill and Pennsylvania Life
Insurance Company, Defendants,

Of Which Pennsylvania Life Insurance
Company is Appellant.

MOTION FOR EXTENSION

The undersigned, as counsel for Respondent Mike Russell, hereby moves for a
Thirty (30) day extension of time to file its Initial Brief(s) and Designation of Matter.
These documents are currently due on or before November 10, 2014.

This motion is made on the grounds that other obligations and deadlines will
prevent the undersigned from completing this Brief and Designation by its current
deadline. These obligations include briefs due in the South Carolina Court of Appeals on
November 5, 2014, and November 10, 2014, and a proposed Order/Memorandum of Law
to be filed with the Honorable Walter G. Newman, Special Referee of Lee County. Also,

the undersigned is scheduled to be out of state to take an expert's deposition on Monday, November 10, 2014.

This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculation, the extension, if granted, would extend Respondent's deadline for filing the initial brief and designation of matter to Wednesday, December 10, 2014.

No prior extension has been requested by Respondent on this matter. The Respondent's check for \$25.00 is enclosed.

WHEREFORE, Respondent respectfully prays that this Court extend the deadline for the service and filing of its Initial Brief(s) and Designation of Matter to December 10, 2014.

Respectfully submitted,

By: 

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Attorneys for Respondent Mike Russell

West Columbia, SC
October 30, 2014

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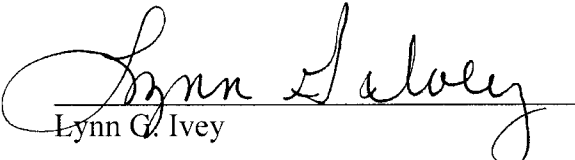
Randolph Gill and Pennsylvania Life
Insurance Company, Defendants,

Of Which Pennsylvania Life Insurance
Company is Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Initial Brief(s) and Designation of Matter on Counsel of Record by depositing a copy of same in the United States Mail, postage prepaid, on October 30, 2014, addressed to the attorney of record as follows:

D. Larry Kristink
1320 Main Street, 17th Floor
Columbia, SC 29201


Lynn G. Ivey

West Columbia, South Carolina
October 30, 2014