



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

November 20, 2014

RECEIVED

NOV 20 2014

S.C. SUPREME COURT

VIA HAND DELIVERY

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

Re: George Skipper, Veronica Skipper, Michael Perry Bowers, Specialty Logging, LLC, and Harold Moors v. ACE Property and Casualty Insurance Company, Brantley C. Rowlen and Erin Lawson Coia
Case Tracking No. 2014-001979

Dear Mr. Shearouse:

Attorney Blake Hewitt has been retained to assist as counsel for the Plaintiffs in this case. Please find enclosed the original and one (1) copy of a request to notice his appearance.

Also, please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have also enclosed a proof of service of these documents on counsel for the Defendants and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: Mark B. Tinsley, Esquire
Randolph Murdaugh, IV, Esquire
Ronald K. Wray, II, Esquire
Robert H. Hood, Jr., Esquire
Justin T. Bamberg, Esquire

RECEIVED

NOV 20 2014

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

Appellate Case No. 2014-001979

George Skipper, Veronica Skipper,
Michael Perry Bowers, Specialty Logging,
LLC, and Harold Moors Plaintiffs,

v.

ACE Property and Casualty Insurance
Company, Brantley C. Rowlen and
Erin Lawson Coia Defendants.

MOTION FOR EXTENSION

This motion is filed pursuant to Rule 240 of the South Carolina Appellate Court Rules, which governs motions and petitions generally.

The plaintiffs respectfully request a 30-day extension of the deadline for filing and serving their brief. The current deadline is November 26, 2014. This is the first extension request for this deadline.

Because this case is a certified question and not a certiorari proceeding, the plaintiffs believe that an extension of this length would not violate this Court's recent pronouncement on certain types of extension requests. See *RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2014 (Shearouse Adv. Sh. No. 28 at 1). The plaintiffs do not wish to unnecessarily delay the resolution of this certified

question. The undersigned intends to begin work on this case as soon as possible and does not anticipate seeking multiple extensions.

Respectfully Submitted,



Blake A. Hewitt, SC Bar # 73674

BLUESTEIN NICHOLS

THOMPSON & DELGADO

P.O. Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

bhewitt@bntdlaw.com

Attorney for Plaintiffs

November 20, 2014

THE STATE OF SOUTH CAROLINA
In the Supreme Court

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

Appellate Case No. 2014-001979

RECEIVED

NOV 20 2014

S.C. SUPREME COURT

George Skipper, Veronica Skipper,
Michael Perry Bowers, Specialty Logging,
LLC, and Harold Moors Plaintiffs,

v.

ACE Property and Casualty Insurance
Company, Brantley C. Rowlen and
Erin Lawson Coia Defendants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Defendants with a copy of the *Notice of Appearance* and *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Ronald K. Wray, II
Gallivan, White & Boyd, PA
P.O. Box 10589
Greenville, SC 29603

Robert H. Hood, Jr., Esquire
Hood Law Firm, LLC
P.O. Box 1508
Charleston, SC 29402

Justin T. Bamberg, Esquire
Lanier & Burroughs, LLC

250 Gibson Street
Orangeburg, SC 29115

A handwritten signature in black ink that reads "Erin Bridges". The signature is written in a cursive style with a horizontal line extending from the end of the name.

November 20, 2014
Columbia, South Carolina

Erin Bridges
Paralegal
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC