

Ronald K. Wray
A member of the South Carolina Bar
Direct 864.271.5362
RWray@GWBlawfirm.com



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW

55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601
Telephone 864.271.9580
Facsimile 864.271.7502
www.GWBlawfirm.com

RECEIVED

January 26, 2015

JAN 29 2015

S.C. SUPREME COURT

Daniel E. Shearouse, Clerk of Court
Supreme Court of South Carolina
PO Box 11330
Columbia, SC 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*
Appellate Case No. 2014-001979

Dear Mr. Shearouse:

Enclosed please find an original and seven (7) copies of ACE Property and Casualty Insurance Company's Motion for Extension of Time and our Proof of Service to be filed regarding the above. We have also enclosed a check in the amount of \$25.00 to cover the filing fee. I would ask that you clock and return to me in the self-addressed, stamped envelope a copy of the above documents.

With kind regards, I am,

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Ronald K. Wray, II

RKW:kd

Enclosures

cc: Mr. Robert Safi (w/enclosures, via email)
Mr. Mark B. Tinsley (w/enclosures)
Mr. Randolph Murdaugh, IV (w/enclosures)
Mr. Robert Hood, Jr. (w/enclosures)
Mr. Blake A. Hewitt (w/enclosures)

RECEIVED

JAN 29 2015

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

S.C. 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 OF DEFENDANT,
ACE PROPERTY AND CASUALTY INSURANCE COMPANY**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Defendant ACE Property and Casualty Insurance Company ("ACE"), hereby moves this Honorable Court for an Order granting it a 30-day extension of time in which to file ACE's brief. Plaintiffs' brief was served by mail on January 12, 2015 and was received by ACE's counsel on January 15, 2015. Accordingly, ACE's brief is currently due on or before February 11, 2015. With a 30-day extension, ACE's brief would now be due on or before March 13, 2015.


In support of this motion, ACE's counsel would show that no prior extensions have been sought or granted in this matter, and ACE's counsel does not anticipate needing any further extensions. Additionally, due to the complexity and importance of

the issues presented by this certified question, ACE's counsel needs additional time to fully prepare ACE's brief. Plaintiffs will not be prejudiced by this 30-day extension as Plaintiffs previously sought and received two extensions from this Court to file Plaintiffs' brief.

WHEREFORE, ACE respectfully requests that the Court grant its motion for extension and extend its deadline to file its initial brief until March 13, 2015.

Respectfully submitted,

January 26, 2015



Ronald K. Wray, II (S.C. Bar #65246)
GALLIVAN, WHITE & BOYD, P.A.
55 Beattie Place; Suite 1200
Greenville, SC 29603
(864) 271-9580
rwrap@gwblawfirm.com

Robert Rivera, Jr. (*admitted pro hac vice*)
Robert S. Safi (*admitted pro hac vice*)
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-5096
Telephone: (713) 651-9366
Fax: (713) 654-6666
rrivera@susmangodfrey.com
rsafi@susmangodfrey.com

Attorneys for Defendant,
ACE Property and Casualty Insurance Company

**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.

PROOF OF SERVICE

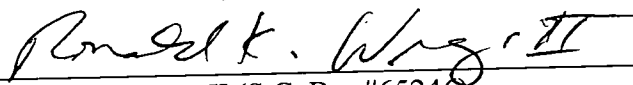
The undersigned hereby certifies that I have this 26th day of January, 2015, served
copies of Defendant ACE Property and Casualty Insurance Company's Motion for
Extension of Time upon counsel by causing them to be deposited in the United States
Mail, first-class postage prepaid, addressed to:

Mr. Blake A. Hewitt
Bluestein Nichols Thompson & Delgado
PO Box 7965
Columbia, SC 29202

Mr. Randolph Murdaugh, IV
Peters, Murdaugh, Parker, Eltzroth &
Detrick, P.A.
PO Box 457
Hampton, SC 29924


Mr. Robert Hood, Jr.
Hood Law Firm
172 Meeting Street
Charleston, SC 29401

Mr. Mark B. Tinsley
Gooding and Gooding, PA
PO Box 1000
Allendale, SC 29810



Ronald K. Wray, II (S.C. Bar #65246)



neopostSM FIRST-CLASS MAIL
01/26/2015
USPOSTAGE \$02.03⁰⁰

ZIP 29601
041L11228956



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW
155 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601

Daniel E. Shearouse, Clerk of Court
Supreme Court of South Carolina
PO Box 11330
Columbia, SC 29211