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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM DARLINGTON COUNTY
Paul M. Burch, Circuit Court Judge

AUG 17 2015
SC Court of Appeals

Appellate Case No. 2015-000806

Ard Trucking Company Respondent,

v.

Travelers Property Casualty Company
of America d/b/a The Travelers Indemnity
Company of Illinois, Appellant. Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Barnwell Whaley Patterson & Helms, LLC
Phillip S. Ferderigos, Esquire
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843-577-7700
Attorney for Appellant

Driggers & Moyd
Martin S. Driggers, Sr., Esquire
P.O. Box 1439
Hartsville, SC 29551
843-332-5151
Attorney for Respondent

Comes now the Appellant Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois (hereinafter "Appellant") and respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for a thirty (30) day extension of time in which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal. Counsel for the Appellant has just returned from being out of the country and requests an extension of time to file its Initial Brief. This motion is not made for the purpose of undue delay. Counsel for the Respondent has consented to this request as evidenced by Consent attached as Exhibit "A."

Accordingly, Appellant requests an Order extending the time to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal by thirty (30) days, or until September 28, 2015.

Respectfully submitted,

By: 


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Counsel for the Appellant

Dated: August 12, 2015

I hereby certify that on the 12th day of August, 2015, I mailed a copy of the foregoing
Motion to counsel of Record, with sufficient postage, properly addressed as follows:

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Attorney for Respondent

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By: 
Beverly Mitton, Legal Assistant