

76939

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Charleston County Master-In-Equity

RECEIVED
AUG 14 2015
SC Court of Appeals

Case No.: 2007-CP-10-3224
Appellate Case No.: 2015-001383

Jana Wright, as Guardian ad Litem for Travis M., a
minor over the age of 14 years. Plaintiff,

v.

Tema Brown. Respondent,

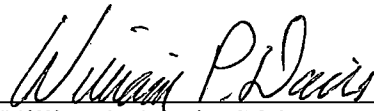
v.

GeoVera Specialty Insurance Co. Appellant.

**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF, DESIGNATION
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF
SERVICE THEREOF AND TO HOLD FILING DEADLINES IN ABEYANCE UNTIL
THE COURT ISSUES AN ORDER DECIDING THE MOTION OF THE MERITS**

Appellant GeoVera Specialty Insurance Company hereby moves for an extension of time for filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof on the Respondent in the above-captioned case. To date, Appellant has not requested an extension of time for any filing. Due to the press of counsel's caseload, and the nature and extent of the issues to be discussed in the Initial Brief, counsel for Appellant requests additional time to complete the Initial Brief and Designation of Matter to be Included in the Record on Appeal. Counsel therefore requests a thirty-day extension of time such that the Initial

Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof would be due on Wednesday, September 23, 2015. While this motion is pending, Appellant requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Appellant's counsel has conferred with counsel for Respondent, who has graciously consented to the extension of time requested herein.



William P. Davis SC Bar No.: 1585
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax: (803) 779-3423
wdavis@brblegal.com File No.: 7746.1857
Attorney for Appellant GeoVera Specialty Insurance Co.

August 14, 2015
Columbia, SC

Other Counsel of Record:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Maybank Law Firm, LLC
P.O. Box 12579
Charleston, SC 29422

Barry I. Baker, Esquire
P.O. Box 31265
Charleston, SC 29417
Attorneys of Record for Plaintiff

Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
Andrew K. Epting, Jr., LLC
46A State Street
Charleston, SC 29401
Attorneys of Record for Defendant/Third-Party Plaintiff and Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Charleston County Master-In-Equity

RECEIVED

AUG 14 2015

SC Court of Appeals

Case No.: 2007-CP-10-3224
Appellate Case No.: 2015-001383

Jana Wright, as Guardian ad Litem for Travis M., a
minor over the age of 14 years. Plaintiff,

v.

Tema Brown. Respondent,

v.

GeoVera Specialty Insurance Co. Appellant

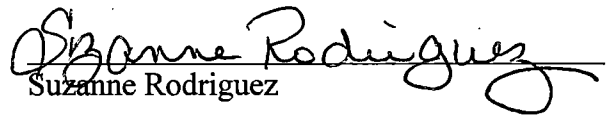
PROOF OF SERVICE

I, Suzanne Rodriguez, Legal Assistant to William P. Davis, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for GeoVera Specialty Insurance Company, Appellant, hereby certify that I have, on this 14th day of August, 2015, served a Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion of the Merits by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel of record at the following addresses:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Maybank Law Firm, LLC
P.O. Box 12579
Charleston, SC 29422

Barry I. Baker, Esquire
P.O. Box 31265
Charleston, SC 29417

Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
Andrew K. Epting, Jr., LLC
46A State Street
Charleston, SC 29401


Suzanne Rodriguez