

77052

STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM BAMBERG COUNTY  
Court of Common Pleas

AUG 26 2015

SC Court of Appeals

Doyet A. Early, III, Circuit Court Judge

Case No. 2013-CP-05-63

Janette Buchanan and Shana Smallwood,  
Individually and as Co-Personal Representatives  
of the Estate of James S. Buchanan, ..... Respondents,

v.

The South Carolina Property and Casualty  
Insurance Guaranty Association, ..... Appellant.


**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, the respondents request a 30-day extension of the deadline for filing the initial brief and designation of matter to be included in the record on appeal. The current deadline is August 26, 2015. Due to a recent violent storm counsel for Respondents has had to spend and inordinate amount of time out of the office dealing with damage to his home. This is the third request for an extension of this deadline. Counsel for appellant consents to this request.

/Signature page attached

August 26, 2015

Respectfully submitted, ,



John S. Nichols, Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, SC 29202

(803) 779-7599

Attorneys for Respondents

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BAMBERG COUNTY  
Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge

---

Case No. 2013-CP-05-63

---

RECEIVED

AUG 26 2015

SC Court of Appeals

Janette Buchanan and Shana Smallwood,  
Individually and as Co-Personal Representatives  
of the Estate of James S. Buchanan, ..... Respondents,

v.

The South Carolina Property and Casualty  
Insurance Guaranty Association, ..... Appellant.

---

**PROOF OF SERVICE**

---

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

Howard A. Van Dine, III  
A. Mattison Bogan  
Erik T. Norton  
Tara C. Sullivan  
Nelson Mullins Riley & Scarborough, LLP  
PO Box 11070  
Columbia, SC 29211

August 26, 2015  
Columbia, South Carolina



---

Erin Bridges



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

August 26, 2015

RECEIVED

AUG 26 2015

SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Janette Buchanan and Shana Smallwood, Individually and as Co-Personal  
Representatives of the Estate of James S. Buchanan v. The South Carolina  
Property and Casualty Insurance Guaranty Association  
Case Tracking No.: 2015-000246

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of the *Motion for Extension* in this case. I have also enclosed a proof of service on counsel for the Appellant and our firm check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me via our courier.

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

Sincerely,

Erin Bridges

Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Daniel W. Luginbill, Esquire

Howard A. Van Dine, III, Esquire

A. Mattison Bogan, Esquire

Erik T. Norton, Esquire

Tara C. Sullivan, Esquire