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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SEP 21 2015
SC Court of Appeals

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

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 SECOND 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 a second 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 requested one extension of time to file same. Appellant files this motion seeking an additional extension on the grounds that undersigned counsel broke his leg on September 19, 2015, hindering his ability to finish Appellant's Initial Brief and Designation of Matter, and

counsel for Respondent advised him this morning that she was expecting twins in October and the timing with regard to Respondent's initial brief would be much better for her if Appellant were to obtain an additional thirty-day extension. Counsel therefore requests an additional 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 Friday, October 23, 2015. Counsel for Appellant received the transcript of the May 19, 2014 hearing on the parties' cross motions for summary judgment by e-mail on July 24, 2015 and by U.S. Mail on July 28, 2015, and also received the transcript of the May 13, 2015 on Appellant's motion for reconsideration and to alter or amend the judgment by e-mail on July 8, 2015 and by U.S. Mail on July 13, 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.



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Attorney for Appellant

September 21, 2015
Columbia, SC

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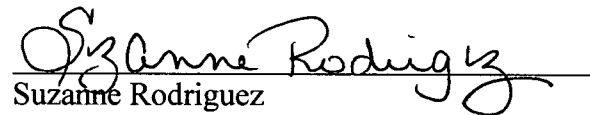
PROOF OF SERVICE

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 21st day of September, 2015, served a Second 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:

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