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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Paul M. Burch, Circuit Court Judge

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NOV 12 2015

SC Court of Appeals

Appellate Case No. 2015-001827

Erie Insurance Exchange.....Respondent.

v.

Government Employees Insurance Company, Mark Allison Scoggin and Angela Bennett Hill,
Defendants,

Of whom Government Employees Insurance Company is.....Appellant.

MOTION FOR EXTENSION

The Appellant, by and through the undersigned, respectfully moves, pursuant to Rule 234(b) of the South Carolina Appellate Court Rules, this Honorable Court for a thirty (30) day extension of time in which to file and serve the Appellant's Initial Brief on Appeal and Designation of Matter to be included in the record on appeal. The grounds therefor are as follows:

1. The transcript from the Lower Court was served on October 17, 2015.
2. The Appellant's Initial Brief and Designation of Matter are due November 16, 2015 currently.

3. Due to the undersigned's trial, etc., schedule, the Appellant is in need of additional time in which to file and serve the Initial Brief and Designation of Matter.

4. If the requested extension is granted, the Appellant's Initial Brief and Designation of Matter will be due on or before December 16, 2015.

5. After consultation, counsel for the Respondent consents to this extension of time.

WHEREFORE, the Appellant respectfully prays that this Honorable Court grant it an extension of thirty (30) days in which to file an Initial Brief and Designation of Matter to be included in the record on appeal.

November 10, 2015



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ATTORNEYS FOR APPELLANT

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v.

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Of whom Government Employees Insurance Company is.....Appellant.

PROOF OF SERVICE

I, the undersigned, as an attorney for Appellant, do hereby certify that I have served the *Motion for Extension* this 10th day of November, 2015 upon counsel of record by depositing the same in a U.S. Postal Box in an envelope, sufficient postage prepaid, properly addressed as follows:

J. Dwight Hudson, Esquire
Hudson Law Offices
1203 48th Avenue North, Suite 111
Myrtle Beach, SC 29577

Ian D. Maguire, Esquire
Maguire Law Firm
1600 Oak Street, Suite B
Myrtle Beach, SC 29577



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ATTORNEY FOR APPELLANT

KING & LOVE

ATTORNEYS AT LAW

Robert T. King †*
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November 10, 2015

Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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RE: Erie Insurance Exchange v. Government Employees Insurance Company,
Mark Allison Scoggin and Angela Bennett Hill
Appellate Case No.: 2015-001827
Our File No.: 41.01747

Dear Ms. Kitchings:

Please find enclosed the original and seven copies of a Motion for Extension on behalf of Government Employees Insurance Company along with the Proof of Service in regards to the above matter. Please file the original and six copies in your office and return a clocked copy to us in the enclosed envelope. We have also enclosed our firm's check in the amount of \$25 which represents the filing fee.

By copy of this letter to all counsel of record, we are herewith serving them with this Motion for Extension.

Thank you. I am

Sincerely,



Edward A. Love
ELove@kingandlove.com

EAL/wl

Enclosures

cc: J. Dwight Hudson, Esquire
Ian D. Maguire, Esquire
Ms. JeT'aime Gordon
Claim No.: 0315647190101020



**KING &
LOVE**
ATTORNEYS AT LAW

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