

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Appellate Case No. 2015-001452

71957

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NOV 23 2015

SC Court of Appeals

Levern McCray,

Appellant,

v.

Jose W. Valle,

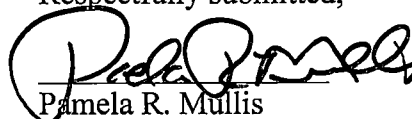
Respondent,

MOTION FOR EXTENSION OF TIME

On October 27, 2015, the Court ordered that the due date for the Initial Brief of Respondent, liberty Mutual, was extended to November 25, 2015. However, the Initial Brief of Respondent was served on November 16, 2015 and received by Counsel for Appellant on November 19, 2015. Therefore, Appellant's Initial Reply Briefs are currently due to be served and filed on Thanksgiving Day, November 26, 2015.

Counsel's office is closed on November 26-27, 2015, for the holiday. In addition, Counsel for Appellant is scheduled to attend the Auto Torts Seminar in Atlanta on December 3-6, 2015. Therefore, Counsel for Appellant respectfully requests that the Court extend the due date for the Initial Reply Briefs of Appellant to December 11, 2015. Upon consultation, Counsel for both Respondents Allstate and Liberty Mutual have graciously consented to extension of the time for service and filing of Appellant's Reply Briefs to December 11, 2015.

Respectfully submitted,



Pamela R. Mullis
MULLIS LAW FIRM
1229 Elmwood Avenue
Post Office Box 7757
Columbia, SC 29202
(803) 799-9577

COUNSEL FOR APPELLANT

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Levern McCray,

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PROOF OF SERVICE

I certify that I have served Appellant's Motion for Extension of Time on counsel for Liberty Mutual and Allstate Insurance by depositing a copy of it in the United States Mail, postage prepaid, on November 23, 2015, addressed to their attorneys of record:

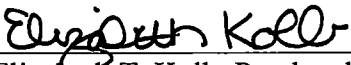
Morgan S. Templeton, Esquire
Wall Templeton, Esquire
145 King St., Ste. 300
Charleston, SC 29401

John T. Lay, Esquire
Gallivan, White & Boyd
1201 Main Street, Suite 1200
Columbia, SC 29201

Attorney for Liberty Mutual Ins.

Attorney for Allstate Ins.

November 23, 2015.


Elizabeth T. Kolb, Paralegal to
Pamela R. Mullis
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SC Court of Appeals

Pamela R. Mullis

J. Marvin Mullis, Jr.
1940-2012

Joseph M. Epting, Jr.

November 23, 2015

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

Via Hand Delivery

RE: Levern McCray v. Jose W. Valle
Appellate Case No.: 2015-001452

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of the Appellant's Motion for Extension of Time along with the proof of service and \$25.00 check for the filing fee in this matter.

Sincerely,

Pamela R. Mullis

Pamela R. Mullis

ATTORNEY FOR THE APPELLANTS

OTHER COUNSEL OF RECORD:

Morgan S. Templeton, Esquire
John T. Lay, Esquire