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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 for the Ninth Circuit

SC Court of Appeals

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

Case No.: 2007-CP-10-3224

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

v.

Tema Brown, RESPONDENT

v.

GeoVera Specialty Insurance Co., APPELLANT.

MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENT'S INITIAL BRIEF
AND DESIGNATION OF MATTER

Respondent, Tema Brown, by and through her undersigned counsel, hereby moves this Honorable Court, for an Order granting Respondent an extension of time, until March 1, 2016 to serve and file her Initial Brief and Designation of Matter to be Included in the Record on appeal.

The ground for this motion is that counsel for Respondent, Michelle N. Endemann, gave birth to twins and is on maternity leave.

Counsel for Appellant, GeoVera Specialty Insurance Co., has been consulted and consents to Respondent's request.

Respectfully Submitted By:

ANDREW K. EPTING, JR., LLC

By  _____

Andrew K. Epting, Jr.

Michelle N. Endemann

46A State Street, Charleston, SC 29401

Phone: 843-377-1871; Fax: 843-377-1310

Attorneys for Respondent

Dated this 9 day of November, 2015
Charleston, South Carolina

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PROOF OF SERVICE

I certify that I have served Appellant with the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter by delivering a copy via regular U.S. Mail on November 9, 2015, addressed to their attorneys of record as follows:

William P. Davis
Baker Ravenel & Bender, LLP
3710 Landmark Drive, Ste 400
Columbia, SC 29202

ANDREW K. EPTING, JR., LLC

By AK Epting, Jr.
Andrew K. Epting, Jr.
Michelle N. Endemann
46A State Street, Charleston, SC 29401
843-377-1871; Fax: 843-377-1310
Attorneys for Appellant

ANDREW K. EPTING, JR., L.L.C.
ATTORNEYS AT LAW

November 9, 2015

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RE: Jana Wright, etc v. Brown v. Geovera Specialty Insurance Co.
Appellate No.: 2015-01383

Dear Ms. Abbott Kitchings:

Enclosed please find the original and seven copies of Respondent's Motion for Extension to File Initial Brief and Designation of Matter to be Included in the Record and Proof of Service in the above-referenced matter. Also enclosed is the \$25 motion fee. I would greatly appreciate your filing the original and returning a file-stamped copy to me in self-addressed, stamped envelope provided. Thank you.

With kind regards,

ANDREW K. EPTING, JR., LLC



Andrew K. Epting, Jr.

AKE, Jr./agg

Enclosures

cc: William P. Davis, Esq.
Amanda Maybank, Esq.
Barry Baker, Esq.

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The Honorable Jenny Abbott Kitchings
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