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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE
COURT OF APPEALS

APPEAL FROM DARLINGTON COUNTY
PAUL M. BURCH, CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2015-000806

Ard Trucking Company Respondent

vs.

Travelers Property Casualty Company of America
d/b/a The Travelers Indemnity Company of Illinois,Appellant

MOTION BY RESPONDENT FOR EXTENSION OF TIME TO FILE
REPLY BRIEF OF RESPONDENT AND DESIGNATION OF MATTER

Barnwell Whaley Patterson & Helms LLC
Phillip S. Ferderigos, Esquire
PO Drawer H
Charleston, SC 29401
843-577-7700
Attorney for Appellant

Driggers & Moyd
Martin S. Driggers, Sr.
Post Office Box 1439
Hartsville, SC 29551
Attorney for Respondent

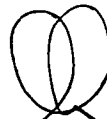
Respondent Ard Trucking Company respectfully requests the Court for an Order pursuant to Rule 263 (b) SCACR for a second thirty (30) day extension of time to file and serve its Reply Brief and Designation of Matter to be included in the Record of Appeal. Respondent received Appellant's Initial Brief and Designation of Matter on September 30, 2015 which caused Respondent's Reply Brief to be due on or before October 30, 2015. However, this Court issued an Order dated November 9, 2015 extending the filing time until November 30, 2015.

Counsel for Respondent has been unable to fully review the record and finalize Respondent's brief. Unfortunately, the current extended deadline is insufficient for Respondent's counsel to complete the review and Respondent's Brief, which is limited in part by personal plans to be out of my office during the Thanksgiving Holidays.

This motion is not made for the purpose of undue delay. Counsel for Appellant has consented to this request as evidenced by Consent attached as Exhibit "A."

Accordingly Respondent respectfully requests an this Court to issue an Order extending the time to file and serve its Reply Brief and Designation of Matter to be included in the Record on Appeal by thirty (30) days or until December 30, 2015.

Respectfully submitted,

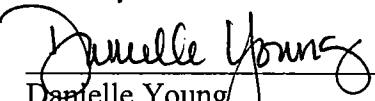


By: Counsel for Respondent
Martin S. Driggers, Sr.
Driggers and Moyd
PO Box 1439
Hartsville, SC 29551
(843) 332-5151

Dated: 11-20-2015

I hereby certify that on the 20th day of November, 2015, I mailed a copy of the Foregoing Motion to counsel of record , with sufficient postage, properly addressed as follows:

Phillip Ferderigos
Barnwell Whaley Patterson & Helms LLC
PO Drawer H
Charleston, SC 29402

By: 

Danielle Young
Administrative Assistant to Martin S. Driggers, Sr.
Driggers and Moyd
PO Box 1439
Hartsville, SC 29551

Dated: 11-20-15

DRIGGERS & MOYD

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MARTIN S. DRIGGERS, SR.
DAVID H. MOYD

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SC Court of Appeals

TELEPHONE
843-332-5151
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November 20, 2015

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Ard Trucking Company, Respondent
vs.
Travelers Property Casualty Company of America d/b/a The Travelers Indemnity
Company of Illinois, Appellant
Appellate Court Case: 2015-000806

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Motion for Extension of Time to File Respondents Reply Brief and Designation of Matter as well as our check for \$25.00. Please file the original and return the clocked copy to me in the envelope provided herein.

Thank you for your assistance in this matter.

Sincerely,



Martin S. Driggers, Sr.

MSD/dy

cc: Phillip Federigos
Barnwell Whaley Patterson & Helms
PO Drawer H
Charleston, SC 29402

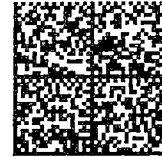
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SC Court of Appeals

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