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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

RECEIVED

JAN 14 2016
Respondent,
SC Court of Appeals

Ard Trucking Company

v.

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

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

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

Driggers & Moyd
Martin S. Driggers, Sr., Esquire
P.O. Box 1439
Hartsville, SC 29551
843-332-5151
Attorney for Respondent

Comes now the Appellant Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois (hereinafter "Appellant") and respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for a twenty (20) day extension of time in which to file and serve its Reply Brief and Designation of Matter to be Included in the Record on Appeal. This motion is not made for the purpose of undue delay. Counsel for the Respondent has consented to this request as evidenced by the email attached as Exhibit "A."

Accordingly, Appellant requests 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 twenty (20) days, or until February 8, 2016.

Respectfully submitted,

By: 

Phillip S. Ferderigos
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401
P.O. Drawer H (29402)
(843) 577-7700
Counsel for the Appellant

Dated: January 12, 2016

Phillip Ferderigos

From: Phillip Ferderigos
Sent: Friday, January 08, 2016 2:50 PM
To: 'Dani Young on GD'
Subject: RE: Ard vs. Travelers

Thanks, have a great weekend. Phillip.

PHILLIP S. FERDERIGOS
BARNWELL WHALEY PATTERSON & HELMS, LLC
288 Meeting Street | Charleston SC 29401 | 843.577.7700 | 843.329.5329 (D)
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From: Dani Young on GD [mailto:daniyoung@dmlawfirm.net]
Sent: Friday, January 08, 2016 2:49 PM
To: Phillip Ferderigos
Subject: RE: Ard vs. Travelers

Per MSD you have his consent for the extension.
Thanks, Dani

From: Phillip Ferderigos [mailto:pferderigos@barnwell-whaley.com]
Sent: Friday, January 08, 2016 2:30 PM
To: Dani Young on GD
Subject: RE: Ard vs. Travelers

Dani, I have received the Respondent Brief today, can I get Marty's consent to a 20 day extension of time to file a Reply Brief and Record on Appeal?

Let me know at your convenience, thanks, Phillip.

PHILLIP S. FERDERIGOS
BARNWELL WHALEY PATTERSON & HELMS, LLC
288 Meeting Street | Charleston SC 29401 | 843.577.7700 | 843.329.5329 (D)
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of January, 2016, I mailed a copy of the foregoing Motion to counsel of Record, with sufficient postage, properly addressed as follows:

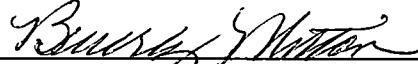
Driggers & Moyd
Martin S. Driggers, Sr., Esquire
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Hartsville, SC 29551
Attorney for Respondent

RECEIVED

JAN 14 2016

SC Court of Appeals

Barnwell Whaley Patterson & Helms, LLC

By: 
Beverly Mitton, Legal Assistant



Phillip S. Ferderigos, Partner
PFerderigos@barnwell-whaley.com

January 12, 2016

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JAN 14 2016

SC Court of Appeals

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

RE: Ard Trucking Company, Respondent
v.
Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois, Appellant
Appellate Court Case No. 2015-000806

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Motion for Extension of Time to File Reply Brief of Appellant and Designation of Matter as well as our check for \$25. Please file the original and return the clocked copy to me in the envelope provided herein.

Thank you for your assistance.

With kind regards,

Phillip S. Ferderigos

Enc.

Cc w/enc.: Martin S. Driggers, Sr., Esq.

PSF/bbm

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**BARNWELL
WHALEY**

PATTERSON & HELMS LLC

75 1938-2013
YEARS ■

P.O. Drawer H, Charleston, SC 29402-0197

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JAN 14 2016

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals **SC Court of Appeals**
P.O. Box 11629
Columbia, SC 29211

