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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,

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

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 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 on Appeal by twenty (20) days, or until February 28, 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: February 4, 2016

## Beverly Mitton

---

**To:** Phillip Ferderigos  
**Subject:** RE: Ard vs. Travelers

**From:** Phillip Ferderigos <[pferderigos@barnwell-whaley.com](mailto:pferderigos@barnwell-whaley.com)>  
**Date:** February 4, 2016 at 7:55:58 AM EST  
**To:** Dani Young on GD <[daniyoung@dmlawfirm.net](mailto:daniyoung@dmlawfirm.net)>  
**Subject:** Re: Ard vs. Travelers

Great, thanks again...

Sent from my iPhone

On Feb 4, 2016, at 7:47 AM, Dani Young on GD <[daniyoung@dmlawfirm.net](mailto:daniyoung@dmlawfirm.net)> wrote:

Mr. Driggers said sure!  
Thanks, Dani

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**From:** Phillip Ferderigos [<mailto:pferderigos@barnwell-whaley.com>]  
**Sent:** Monday, February 01, 2016 10:35 AM  
**To:** Dani Young on GD  
**Subject:** RE: Ard vs. Travelers

Dani, Travelers Reply Brief is currently due on the February 8th, can I get Marty's consent to a final 20 day extension of time to file a Reply Brief and Record on Appeal, making it due on or before February 28th?

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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<image001.jpg>

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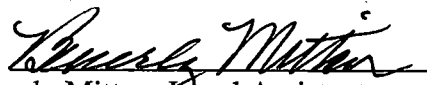
SC Court of Appeals

CERTIFICATE OF SERVICE

I hereby certify that on the 1<sup>st</sup> day of February, 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  
P.O. Box 1439  
Hartsville, SC 29551  
*Attorney for Respondent*

Barnwell Whaley Patterson & Helms, LLC

By:   
Beverly Mitton, Legal Assistant



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

February 1, 2016

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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 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

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YEARS ■  
1938-2013

P.O. Drawer H, Charleston, SC 29402-0197  
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**SC Court of Appeals**

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



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