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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

RECEIVED

FEB 11 2016

SC Court of Appeals

Case No.: 2007-CP-10-3224
Appellate Case No.: 2015-001383

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

v.

Tema Brown. Respondent,

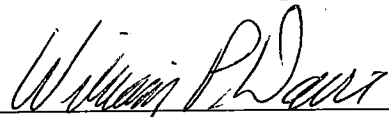
v.

GeoVera Specialty Insurance Co. Appellant.

**MOTION FOR EXTENSION TO FILE AND SERVE RETURN TO RESPONDENT'S
MOTION TO STRIKE AND TO STAY THE TIME TO FILE THEIR BRIEF UNTIL
THE MOTION TO STRIKE IS DECIDED, AND PROOF OF SERVICE THEREOF, AND
TO HOLD FILING DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN
ORDER DECIDING THIS MOTION ON THE MERITS**

Appellant GeoVera Specialty Insurance Co., hereby moves for an extension of time to file its return to Respondent's motion to strike and to stay the time to file their brief until the motion to strike is decided, and proof of service thereof, in the above-referenced case. To date, appellant has not requested an extension of time to file same. Appellant requests additional time because its undersigned counsel was diagnosed with bronchitis on Saturday, February 6th, which is the day after Respondent's motion was served, and undersigned counsel needs additional time

to recover and prepare an appropriate return. Counsel therefore requests a ten (10) day extension of time such that the return and proof of service thereof would be due on February 25, 2016. While this motion is pending, appellant requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Appellant's counsel has conferred with counsel for Respondent, who has consented to the extension of time requested herein. Appellant's counsel likewise consents to that portion of Respondent's motion requesting a stay of the deadline for filing Respondent's initial brief and designation of matter on appeal.



William P. Davis SC Bar No.: 1585
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wdavis@brblegal.com File No.: 7746.1857
Attorneys for Appellant

Columbia, SC
February 11, 2016

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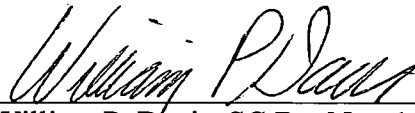
PROOF OF SERVICE

I, William P. Davis, attorney of Baker, Ravenel & Bender, L.L.P., attorneys for Appellant, do hereby certify that on the 11th day of February, 2016, I have served the following with the foregoing Motion for Extension to File and Serve Return to Respondent's Motion to Strike and to Stay the Time to File Their Brief Until the Motion to Strike is Decided, and Proof of Service thereof, by mailing copies of same by United States Mail, postage prepaid, to counsel of record at the addresses shown below:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Maybank Law Firm, LLC
P.O. Box 12579
Charleston, SC 29422

Barry I. Baker, Esquire
P.O. Box 31265
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Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
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wdavis@brblegal.com File No.: 7746.1857
Attorney for Appellant GeoVera Specialty Insurance Co.



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

RECEIVED

FEB 11 2016

SC Court of Appeals

William P. Davis
wdavis@brblegal.com
(803) 343-3865 – direct dial

February 11, 2016

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Re: Jana Wright, as Guardian ad Litem for Travis Milligan, a minor over the age of 14 years,
Respondent v. Tema Brown, Respondent v. GeoVera Specialty Insurance Company,
Appellant
Appellate Case No.: 2015-001383
Our File No.: 7746.1857

Dear Ms. Kitchings:

Please find enclosed for filing an original and seven (7) copies of a Motion for Extension to File and Serve Return to Respondent's Motion to Strike and to Stay the Time to File Their Brief Until the Motion to Strike is Decided, and Proof of Service Thereof, and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding this Motion on the Merits. I have also enclosed proof of service thereof on Respondent's counsel. Please return a stamped copy to me via the courier delivering same. I have enclosed our firm's check in the amount of \$25.00 to cover the filing fee.

By copy hereof, I am serving same upon counsel for Respondent, who have consented to the extension requested.

Thank you very much.

Sincerely yours,

William P. Davis

WPD:tfk

Enclosure

cc:w/encl:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Barry I. Baker, Esquire
Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire