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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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FEB 22 2016
SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Paul M. Burch, Circuit Court Judge

Appellate Case No. 2015-001827

Erie Insurance Exchange.....Respondent.

v.

Government Employees Insurance Company, Mark Allison Scoggin and Angela Bennett Hill,
Defendants,

Of whom Government Employees Insurance Company is.....Appellant.

MOTION FOR EXTENSION

The Appellant, by and through the undersigned, respectfully moves, pursuant to Rule 234(b) of the South Carolina Appellate Court Rules, this Honorable Court for a ten (10) day extension of time in which to file and serve the Appellant's Reply Brief on Appeal. The grounds therefor are as follows:

1. Due to the undersigned's trial, etc., schedule, the Appellant is in need of additional time in which to file and serve the Reply Brief.
2. If the requested extension is granted, the Appellant's Reply Brief will be due on or before March 3, 2016.
3. After consultation, counsel for the Respondent consents to this extension of time.

WHEREFORE, the Appellant respectfully prays that this Honorable Court grant it an extension of ten (10) days in which to file Reply Brief.

February 18, 2016



EDWARD A. LOVE #75118
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ATTORNEYS FOR APPELLANT

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v.

Government Employees Insurance Company, Mark Allison Scoggin and Angela Bennett Hill

Of whom Government Employees Insurance Company is.....Appellant.

PROOF OF SERVICE

I, the undersigned, as an attorney for Appellant, do hereby certify that I have served the *Motion for Extension* this 18th day of February 2016 upon counsel of record by depositing the same in a U.S. Postal Box in an envelope, sufficient postage prepaid, properly addressed as follows:

J. Dwight Hudson, Esquire
Hudson Law Offices
1203 48th Avenue North, Suite 111
Myrtle Beach, SC 29577

Ian D. Maguire, Esquire
Maguire Law Firm
1600 Oak Street, Suite B
Myrtle Beach, SC 29577


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ATTORNEY FOR APPELLANT

KING & LOVE

ATTORNEYS AT LAW

Robert T. King †*
Edward A. Love **
Charles J. Hupfer, Jr.
Ashley B. Nance

† CERTIFIED MEDIATOR
* ALSO ADMITTED IN NC
** ALSO ADMITTED IN GA

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

RE: Erie Insurance Exchange v. Government Employees Insurance Company,
Mark Allison Scoggin and Angela Bennett Hill
Appellate Case No.: 2015-001827
Our File No.: 41.01747

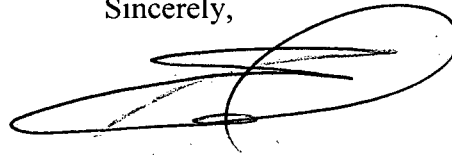
Dear Ms. Kitchings:

Please find enclosed the original and seven copies of a Motion for Extension on behalf of Government Employees Insurance Company along with the Proof of Service in regards to the above matter. Please file the original and six copies in your office and return a clocked copy to us in the enclosed envelope. We have also enclosed our firm's check in the amount of \$25 which represents the filing fee.

By copy of this letter to all counsel of record, we are herewith serving them with this Motion for Extension.

Thank you. I am

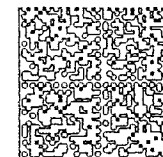
Sincerely,



Edward A. Love
ELove@kingandlove.com

EAL/wl
Enclosures

cc: J. Dwight Hudson, Esquire
Ian D. Maguire, Esquire
Ms. JeT'aime Gordon
Claim No.: 0315647190101020



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ATTORNEYS AT LAW

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