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APR 18 2016
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
RESPONDENT'S FINAL BRIEF

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 ten (10) day extension of time to file and serve Respondent's Final Reply Brief. Respondent received Appellant's Record on Appeal on March 31, 2016. Rule 211 gives Respondent 20 days to complete and file Respondent's Final Brief, so that it would be due on or before April 18, 2016.

Counsel for Respondent has been unable to complete all the permitted revisions to the Initial Brief since receiving the Record on Appeal from Appellant. Unfortunately, the allowed time under Rule 211 is insufficient for Respondent's counsel to complete the permitted revisions to Respondent's Final Brief.

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 Final Reply Brief by April 2016.

Respectfully submitted,



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

Dated: 4/14/16

I hereby certify that on the 14 day of April, 2016, 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
Danielle Young
Administrative Assistant to Martin S. Driggers, Sr.
Driggers and Moyd
PO Box 1439
Hartsville, SC 29551

Dated: April 14, 2016

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

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Ard Trucking Company Respondent

vs.

Travelers Property Casualty Company of America
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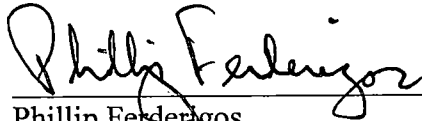
CONSENT TO MOTION BY RESPONDENT FOR EXTENSION OF TIME TO FILE
RESPONDENT'S FINAL BRIEF

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

I, Phillip Ferderigos, Counsel for the Appellant, hereby consent to Respondent's Motion for Extension of Time to File Respondent's Final Brief.

Respectfully submitted,



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

Dated: _____

April 14, 2016

DRIGGERS & MOYD

ATTORNEYS AND COUNSELORS AT LAW

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SC Court of Appeals

April 14, 2016

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

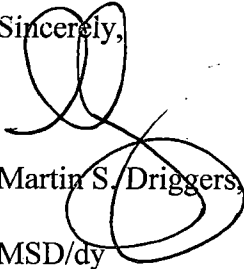
Re: Ard Trucking Company, Respondent
vs.
Travelers Property Casualty Company of America d/b/a The Travelers Indemnity
Company of Illinois, Appellant
Appellate Court Case: 2015-000806

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Motion for Extension of Time to File Respondents Final Brief 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

DRIGGERS & MOYD

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SC Court of Appeals

Honorable Jenny Abbott Kitchings

Clerk of the South Carolina Court of Appeals

PO Box 11629

Columbia, SC 29211