

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM WILLIAMSBURG COUNTY  
Court of Common Pleas

**RECEIVED**

Honorable Clifton Newman, Circuit Court Judge

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OCT 11 2012

**S.C. Supreme Court**

Appellate Case No.: 2011-193846

Opinion No. 2011-UP-175 (S.C. Ct. App. filed Apr. 18, 2011)

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Thomas M. Carter, Debra Carter, and Christopher Michael Carter,..... Respondents,

v.

The Standard Fire Insurance Company and Frank L. Siau Agency, Inc.,  
Defendants, of whom The Standard Fire Insurance Company is the ..... Petitioner.

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**MOTION TO EXTEND THE TIME TO FILE AND SERVE PETITIONER'S  
BRIEF, ADDITIONAL COPIES OF APPENDIX, AND PROOF OF SERVICE  
THEREOF AND TO HOLD FILING DEADLINES IN ABEYANCE UNTIL THE  
COURT ISSUES AN ORDER DECIDING THE MOTION ON THE MERITS**

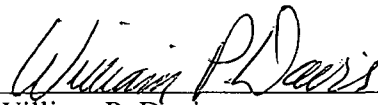
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Pursuant to Rule 240, SCACR, Petitioner, The Standard Fire Insurance Company, Inc., hereby moves for an extension of time for filing the Petitioner's Brief, the additional copies of the Appendix, and Proof of Service thereof on the Respondents in the above-referenced case. Petitioner has not previously requested an extension of time to file its Brief, the additional copies of the Appendix, and Proof of Service.

Due to the press of counsel's caseload and his absence from the office from October 22, 2012 through October 25, 2012 in connection with a client conference in Arizona, Petitioner's counsel requests additional time to complete Petitioner's Brief.

Counsel therefore requests a thirty-day extension of time, such that the Petitioner's Brief, the additional copies of the Appendix, and Proof of Service thereof would be due on December 3, 2012 (as December 2, 2012 is a Sunday).

While this motion is pending, Petitioner requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Petitioner's counsel has conferred with counsel for Respondents and counsel for Frank L. Siau Agency, Inc., who have consented to the extension of time requested herein.



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E-mail: [wdavis@brblegal.com](mailto:wdavis@brblegal.com) 7746.1470.2  
*Attorneys for Petitioner The Standard Fire  
Insurance Company*

October 11, 2012

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**PROOF OF SERVICE**

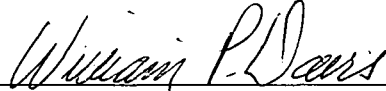
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I, William P. Davis, attorney for Petitioner The Standard Fire Insurance Company, do hereby certify that I have this 11<sup>th</sup> day of October 2012 served all counsel of record with copies of **Motion to Extend The Time To File and Serve Petitioner's Brief, Additional Copies of Appendix, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits** by mailing said copies by United States Mail, first class postage pre-paid, to said counsel at the following addresses:

William P. Hatfield, Esquire  
Hyman Law Firm  
Post Office Box 1770  
Florence, SC 29503

Wesley D. Peel, Esquire  
Bruner, Powell, Robbins, Wall  
& Mullins, LLC  
Post Office Box 61110  
Columbia, SC 29260

Robert Hill, Esquire  
Law Offices of Robert Hill  
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*Attorneys for Petitioner The Standard Fire  
Insurance Company*



# BAKER RAVENEL BENDER

ATTORNEYS AT LAW

October 11, 2012

**RECEIVED**

OCT 11 2012

**S.C. Supreme Court**

**HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
1231 Gervais Street  
Columbia, South Carolina 29201

Re: Thomas M. Carter, Debra Carter and Christopher Michael Carter,  
Respondents v. The Standard Fire Insurance Company and Frank L. Siau  
Agency, Inc., Defendants, of whom The Standard Fire Insurance  
Company is the Petitioner.  
Appellate Case No.: 2011-193846  
Our File No.: 7746.1470.2

Dear Mr. Shearouse:

Enclosed for filing in the above-referenced matter are the original and six (6) copies of Petitioner's Motion to Extend the Time to File and Serve Petitioner's Brief, Additional Copies of Appendix, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits. I have also enclosed Proof of Service and our firm check in the amount of \$25.00 for the filing fee.

I have attached an extra copy of the Motion and Proof of Service, which I would appreciate your clocking in and returning to me via the courier delivering same.

Sincerely yours,

William P. Davis

WPD:sr

Enclosures

cc: Robert Hill, Esquire (w/enclosure)  
William P. Hatfield, Esquire (w/enclosure)  
Wesley D. Peel, Esquire (w/enclosure)

D. CRAVENS RAVENEL

JAY BENDER

S. MARKEY STUBBS

CATHARINE GARBEЕ GRIFFIN

WILLIAM PEARCE DAVIS

BRADLEY L. LANFORD

SAMUEL M. MOKEBA

SUSAN DRAKE DUBOSE

ROBERT L. BROWN

MARIEL D. NORTON

PATRICK D. QUINN

WILSON P. DAVIS

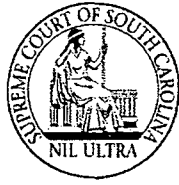
CHARLES E. BAKER

(1935-2010)

<sup>1</sup>OF COUNSEL

<sup>2</sup>ALSO ADMITTED IN GEORGIA

<sup>3</sup>ALSO ADMITTED IN VIRGINIA



# The Supreme Court of South Carolina

Baker Ravenel Bender

10/12/2012

## RECEIPT #65855

**Case No:** 2011-193846  
**Case Short Title:** Thomas M. Carter v. Standard Fire Ins. Co.  
**Event:**  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 64109  
**Check/Money Order Date:** 10/09/2012  
**Comments:**