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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAY 17 2016
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

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,

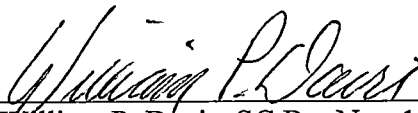
v.

GeoVera Specialty Insurance Co. Appellant.

**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL REPLY BRIEF AND
PROOF OF SERVICE THEREOF AND TO HOLD FILING DEADLINES IN
ABEYANCE UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION OF
THE MERITS**

Appellant GeoVera Specialty Insurance Company hereby moves for an extension of time for filing its Initial Reply Brief and Proof of Service thereof on the Respondent in the above-captioned case. To date, Appellant has not requested an extension of time for this filing. Due to the press of counsel's caseload, and the nature and extent of the issues to be discussed in the Initial Reply Brief, counsel for Appellant requests a ten-day extension of time such that the Initial Reply Brief and Proof of Service thereof would be due on Thursday, June 2, 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 graciously consented to the extension of time requested herein.



William P. Davis SC Bar No.: 1585
BAKER, RAVENEL & BENDER, L.L.P.
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Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax: (803) 779-3423
wdavis@brblegal.com File No.: 7746.1857
Attorney for Appellant GeoVera Specialty Insurance Co.

May 17, 2016
Columbia, SC

Other Counsel of Record:

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
Charleston, SC 29417
Attorneys of Record for Plaintiff

Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
Andrew K. Epting, Jr., LLC
46A State Street
Charleston, SC 29401
Attorneys of Record for Defendant/Third-Party Plaintiff and Respondent

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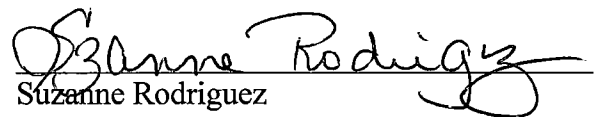
PROOF OF SERVICE

I, Suzanne Rodriguez, Legal Assistant to William P. Davis, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for GeoVera Specialty Insurance Company, Appellant, hereby certify that I have, on this 17th day of May 2016, served a Motion for Extension to File and Serve Initial Reply Brief and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion of the Merits by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel of record at the following addresses:

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

Barry I. Baker, Esquire
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Suzanne Rodriguez



BAKER RAVENEL BENDER
ATTORNEYS AT LAW

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MAY 17 2016

SC Court of Appeals

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

May 17, 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 an Extension to File the Initial Reply Brief and Proof of Service thereof on Respondent's counsel. Please return a filed copy to me via the courier delivering same. I have enclosed our firm check in the amount of \$25.00 to cover the filing fee.

By copy hereof, I am serving same upon counsel for the Respondent.

Thank you very much.

Sincerely yours,

William P. Davis

WPD:sr

Enclosure

cc:w/encl:

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