

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Clayton B. McCullough, Esquire, Special Referee

Case No.: 2016-000063

RECEIVED

JUN 03 2016

SC Court of Appeals


NATIONWIDE MUTUAL FIRE INSURANCE COMPANY.....Appellant

ANNA ANGELACCI, AS GUARDIAN OF K.B., A MINOR..... Respondents

E.U., A MINOR, TRAVIS O. FELKEL, AND GINGER G. ULERY,.....Defendants

**MOTION FOR EXTENSION**

Please take notice that the Appellant hereby requests an extension to file Appellant's Reply Brief. With the extension the Brief will be due July 8, 2016.



\_\_\_\_\_  
 Samuel R. Clawson  
 Christy R. Fagnoli  
 CLAWSON & STAUBES, LLC  
 126 Seven Farms Drive, Suite 200  
 Charleston, South Carolina 29492-8144  
 Phone: (843) 577-2026  
 Fax: (843) 722-2867  
 sclawson@clawsonandstaubes.com  
 cfagnoli@clawsonandstaubes.com

Attorneys for the Nationwide Mutual Fire Insurance Company

Charleston, South Carolina  
June 3, 2016

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Clayton B. McCullough, Esquire, Special Referee

Case No.: 2016-000063

**RECEIVED**

JUN 03 2016

SC Court of Appeals

NATIONWIDE MUTUAL FIRE INSURANCE COMPANY.....Appellant

ANNA ANGELACCI, AS GUARDIAN OF K.B., A MINOR.....Respondents

E.U., A MINOR, TRAVIS O. FELKEL, AND GINGER G. ULERY.....Defendants

**PROOF OF SERVICE OF MOTION FOR EXTENSION**

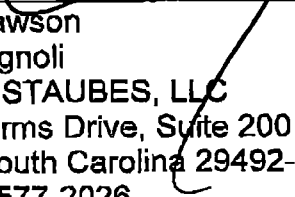
I certify that I have served the Motion for Extension on Respondents and Defendants above-named by depositing a copy of it in the United States Mail, postage prepaid, on June 3, 2016, addressed to their attorneys of record:

David Yarborough, Esq.  
Yarborough Applegate, LLC  
291 E Bay St #2  
Charleston, SC 29401-1601

Mark Tinsley, Esq.  
Gooding & Gooding, PA  
PO Box 1000  
Allendale, SC 29810-1000

Shannon Jones, Esq.  
Shannon Jones Law, LLC  
3 State St  
Charleston, SC 29401-3308

G. Troy Thames, Esq.  
Willson Jones Carter & Baxley, P.A.  
421 Wando Park Blvd Ste 100  
Mount Pleasant, SC 29464-7960



---

Samuel R. Clawson  
Christy R. Fagnoli  
CLAWSON & STAUBES, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, South Carolina 29492-8144  
Phone: (843) 577-2026  
Fax: (843) 722-2867  
sclawson@clawsonandstaubes.com  
cfagnoli@clawsonandstaubes.com

Attorneys for Nationwide Mutual Fire  
Insurance Company

CLAWSON & STAUBES, L.L.C. - ATTORNEYS AT LAW  
CHARLESTON, SC 29492-7595

CHECK

DATE	DESCRIPTION	INVOICE #	AMOUNT	DEDUCTION	NET AMOUNT
06/03/16	South Carolina Court of Appeals filing fee/2015-1603		25.00		25.00

CHECK DATE 06/03/16	CONTROL NUMBER 5841	TOTALS ▶ Gross:	25.00	Ded:	0.00	Net:	25.00
------------------------	------------------------	-----------------	-------	------	------	------	-------

DOCUMENT INCLUDES VISIBLE FIBERS, CHEMICAL REACTIVE PROPERTIES AND FEATURES A FOIL HOLOGRAM

**CLAWSON & STAUBES, L.L.C.**  
ATTORNEYS AT LAW  
(843) 577-2026  
128 SEVEN FARMS DRIVE, SUITE 200  
CHARLESTON, SC 29492-7595

**SOUTH STATE BANK**  
67-98/632

DATE: 06/03/16  
CHECK: 5841  
AMOUNT: \*\*\*\*\*\$25.00

PAY TO THE ORDER OF: **South Carolina Court of Appeals**

\*\*\* TWENTY-FIVE & 00/100 DOLLARS \*\*\*

CLAWSON & STAUBES, L.L.C. - ATTORNEYS AT LAW  
GENERAL OPERATING ACCOUNT

*[Signature]*  
AUTHORIZED SIGNATURE

TRUE WATERMARK PAPER - HOLD TO LIGHT TO VIEW  
PAPER CONTAINS TONER ADHESION PROPERTIES  
HEAT SENSITIVE: NED IMAGE DISAPPEARS WITH HEAT

⑈005841⑈ ⑈053200983⑈8010000139678⑈

# CLAWSON AND STAUBES LLC

Christy R. Fagnoli  
Licensed in SC  
cfagnoli@clawsonandstaubes.com

June 2, 2016

File No.: 20151603.000

**VIA US MAIL & FACSIMILE – 803-734-1839**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211-1629

RECEIVED

JUN 03 2016

SC Court of Appeals

Re: Anna Angelacci v. E.U., a minor.  
Case No.: 2014-CP-08-02494  
Appellate Case No.: 2016-000063

Dear Ms. Kitchings:

I am requesting an extension of time to file Appellant's Reply Brief regarding the above-referenced case. With the extension, the Initial Brief would be due July 8, 2016. I have enclosed a check for \$25.00 to cover your administrative fee.

Thank you for your assistance in this matter.

Very truly yours,

CLAWSON and STAUBES, LLC

Christy R. Fagnoli



CRF/mmg  
Enclosures

cc: Shannon Jones, Esq.  
G. Troy Thames, Esq.  
Mark B. Tinsley, Esq.  
David Yarborough, Esq.

RECEIVED

JUN 03 2016

SC Court of Appeals

fax

CONFIDENTIAL

TO: The Honorable Jenny Kitchings

FROM: John-Paul Baum

FAX: (834) 734-1839

PAGES: (5)

PHONE: (843) 577-2026 extension 2225

DATE: June 3, 2016

RE: Anna Angelacci, as guardian of K.B., a minor CC:  
vs. E.U., a minor, Travis O. Felkel,  
and Ginger G. Ulery

- Urgent
- For Review
- Please Comment
- Please Reply
- Please Recycle

Comments:

---

The information contained in this transmission is privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have read this communication in error, please notify us immediately by telephone and return the original message to us at the above address via the U.S. Postal Service. Thank You.

---

IF YOU DO NOT RECEIVE ALL PAGES TRANSMITTED, OR HAVE ANY PROBLEMS WITH THE TRANSMISSION, PLEASE NOTIFY US AT THE ABOVE NUMBER.

FOR OFFICE USE ONLY: DATE FAXED: \_\_\_\_\_ TIME \_\_\_\_\_ .m.