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SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Jocelyn Newman, Circuit Court Judge

Case No. 14- CP-40-04661

Appellate Case No. 2016-000986

Porthemos Curry.....Respondent/Appellant.

v.

Carolina Insurance Group of SC, Inc. and Maurice Derrick.....Appellants

**RESPONDENT/APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF**

Respondent/Appellant hereby moves for an additional thirty (30) days in which to file its Initial Brief that is currently due August 1, 2016 (since July 30, 2016 is a Saturday). The undersigned counsel are scheduled to be out of town for previously scheduled vacations for several weeks in July and respectfully request the additional time to file the Initial Brief.

GOODWYN LAW FIRM, LLC
Rachel Peavy
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T. Jeff Goodwyn, Jr. Esquire [#73789]
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Attorneys for Respondent/Appellant

Dated: *July 1, 2016*

Other Counsel of Record:

Wesley R. Peel, Esq.

Bryan M.J. Triplett

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PO Box 61110

Columbia, SC 29260-1110

Attorneys for Appellants

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

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SC Court of Appeals

Honorable Jocelyn Newman, Circuit Court Judge

Case No.: 2014-CP-40-04661

Appellate Case No.: 2016-000986

Porthemos Curry.....Respondent,

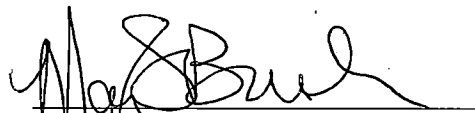
v.

Carolina Insurance Group of SC, Inc. and Maurice Derrick.....Appellants.

PROOF OF SERVICE

I certify that I have served **Respondent's Motion for Extension of Time to File Initial Brief** on Wesley D. Peel, Counsel for the Appellants at the address below by depositing a copy of same in the United States Mail, postage prepaid, on July 1, 2016.

Wesley D. Peel, Esquire
Bruner, Powell, Wall & Mullins, LLC
P.O. Box 61110
Columbia, SC 29260-1110



Mary S. Bush
Paralegal to Rachel G. Peavy, Esquire
Goodwyn Law Firm, LLC
2519 Devine Street, Suite A
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(803) 251-4517

July 1, 2016

GOODWYN LAW FIRM, LLC

T. Jeff Goodwyn, Jr.*
Christopher J. Archer

Special Counsel:
Rachel G. Peavy

Of Counsel:
E. Crosby Lewis

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July 1, 2016

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JUL 05 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Porthemos Curry v. Carolina Insurance Group of SC, Inc. and Maurice Derrick*
Appellate Case No.: 2016-000986
Case No.: 2014-CP-40-04661
Our File No.: 3000-0106

Dear Ms. Kitchings:

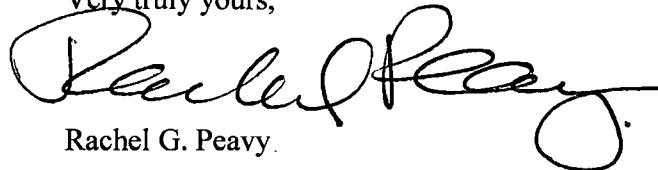
Today I have received a copy of the final transcript from Deborah M. McCurdy, RPR, Court Reporter for the most recent hearing in regard to the above-referenced matter. Pursuant to Rule 208(a)(1), Respondent/Appellant's initial brief will be due within 30 days from today, making it due by August 1, 2016 (since the 30th day falls on Saturday, July 30, 2016).

This letter is to request an additional thirty (30) day extension to file and serve the Initial Brief of Respondent/Appellant, as evidenced by the attached Motion. By my calculations, the requested extension would give us until August 31, 2016 to file and serve our initial reply brief. Enclosed is our firm's check in the amount of \$25.00 representing the required filing fees.

By copy of this letter, I am notifying counsel for the Appellants of my request for an additional thirty (30) days extension.

Thank you and please contact me with any questions or concerns regarding this mater.

Very truly yours,



Rachel G. Peavy

RGP/msb
Enclosure

cc: Wesley D. Peel, Esquire (w/encl.)
Porthemos Curry (w/encl.)

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2519 Devine Street, Suite A
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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
SC Court of Appeals

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