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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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JUL 11 2016

G. Thomas Cooper, Jr., Circuit Court Judge

SC Court of Appeals

C.A. No.: 2011-CP-10-00387

Appellate Case No. 2016-001140

PCS Nitrogen, Inc.Appellant,

v.

Continental Casualty Company, Admiral Insurance Company,
United States Fire Insurance Company, ACE Property &
Casualty Insurance Company, Certain Underwriters at Lloyd's London,
the Aviva Companies, the Winterthur Companies, Certain London
Market Insurance Companies, Providence Washington Insurance
Company (as Successor in Interest by way of Merger to Seaton
Insurance Company, f/k/a Unigard Mutual Insurance Company,
Berkshire Hathaway Specialty Insurance Company (f/k/a Stonewall
Insurance Company), Lexington Insurance Company, Starr
Indemnity & Liability Company (f/k/a Republic Insurance Company),
First State Insurance Company, Century Indemnity Company (f/k/a
California Union Insurance Company and Insurance Company of
North America.....Respondents.


MOTION FOR EXTENSION OF TIME

On behalf of all Respondents, Continental Casualty Co., Admiral Insurance Company,
United States Fire Insurance Company, Ace Property & Casualty Insurance Company, Home
Insurance Company, Certain Underwriters at Lloyd's London, The Aviva Companies, The
Winterthur Companies, Certain London Market Insurance Companies, Unigard Mutual Insurance

Company, Berkshire Hathaway Specialty Insurance Company (F/K/A Stonewall Insurance Company), Lexington Insurance Company, Republic-Vanguard Insurance Company (F/K/A Republic Insurance Company), First State Insurance Company, Century Indemnity Company (F/K/A California Union Insurance Company and Insurance Company of North America (hereinafter referred to as "Respondents")), we hereby request this Honorable Court for an extension of time in which to file their Initial Brief and Designation of Matter to be Included on Record on Appeal. Appellant filed its Initial Brief on June 27, 2016, and under the SCACR, the deadline to file Respondents' Briefs are July 27, 2016. Additionally, counsel for Appellant consents to this extension. Therefore, all Respondents respectfully request this Honorable Court to extend the deadline to file their Initial Briefs and Designations of Matter to be Included on Record on Appeal by thirty (30) days, making the new deadline August 26, 2016.

Respectfully submitted on behalf of Respondents,

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July 8, 2016
Charleston, South Carolina

CONSENTED TO BY APPELLANT, PCS NITROGEN, INC.:

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Insurance Company), Lexington Insurance Company, Starr
Indemnity & Liability Company (f/k/a Republic Insurance Company),
First State Insurance Company, Century Indemnity Company (f/k/a
California Union Insurance Company and Insurance Company of
North America.....Respondents.

PROOF OF SERVICE

I hereby certify that I have served all counsel in this action with a copy of *Motion for Extension of Time* herein specified below by depositing a copy of the same in the United States Mail, postage prepaid, to their attorney of record as follows:

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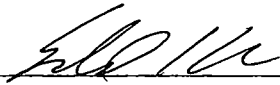
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July 8, 2016
Charleston, South Carolina

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RE: PCS Nitrogen, Inc. v. Continental Casualty Company, et.al.
In the Court of Appeals, State of South Carolina
Appellate Case No.: 2016-001140

Dear Ms. Kitchings:

Please find enclosed for filing an original and one duplicate of Respondents' Motion for Extension of Time in the above matter. Please file the originals and return the stamped filed copies of the duplicates. Please do not hesitate to contact this office with any questions or concerns. By copy of this letter, I have served all counsel of record.

With warmest personal regards, I am

Yours very truly,



Edward K. Pritchard, III, Esq.

EKP/ss

Enclosure

cc: All Counsel of Record (w/enc.)



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