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IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
JUL 15 2016  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
COURT OF COMMON PLEAS

Robert E. Hood, Circuit Court Judge  
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/Respondents.

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

Respondent/Appellant hereby moves for an additional thirty (30) days in which to file *Respondent/Appellant's Initial Brief of Appellant* that is currently due August 8, 2016. The undersigned counsel is scheduled to be out of town for a previously scheduled vacation beginning July 19, 2016 and is further scheduled for a day certain, 3-day trial in Richland County the week of August 1<sup>st</sup>; additionally, the undersigned must accompany her husband to two (2) medical appointments on both July 27<sup>th</sup> and August 10<sup>th</sup>, and such appointments take the entire day as they are out of town. Counsel for Appellants/Respondents, Wesley Peel, has indicated he has no objection to this request.

-signature page to follow-

GOODWYN LAW FIRM, LLC

*Rachel Peavy*

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Attorneys for Respondent/Appellant

Dated: *July 15, 2016*

Other Counsel of Record:

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Bryan M.J. Triplett

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Attorneys for Appellants/Respondents

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

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Honorable Jocelyn Newman, Circuit Court Judge

JUL 15 2016

**SC Court of Appeals**

Case No.: 2014-CP-40-04661

Appellate Case No.: 2016-000986

Porthemos Curry.....Respondent/Appellant,

v.

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

**PROOF OF SERVICE**

I certify that I have served **Respondent/Appellant's Motion for Additional Extension of Time to File Respondent/Appellant's Initial Brief of Appellant** 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 15, 2016.

Wesley D. Peel, Esquire  
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P.O. Box 61110  
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Mary S. Bush  
Paralegal to Rachel G. Peavy, Esquire  
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July 15, 2016

# GOODWYN LAW FIRM, LLC

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July 15, 2016

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JUL 15 2016

SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

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

Dear Ms. Kitchings:

This letter is to request an additional thirty (30) day extension to file and serve the *Respondent/Appellant's Initial Brief of Appellant*, as evidenced by the attached Motion. By my calculations, the requested extension would give us until September 8, 2016 to file and serve the *Respondent/Appellant's Initial Brief of Appellant*. Enclosed is our firm's check in the amount of \$25.00 representing the required filing fees.

I have spoken with Wesley Peel, counsel for the Appellants/Respondents, and he has no objection to my request.

Thank you in advance for your courtesy in this matter. Please do not hesitate to contact me with any questions or concerns regarding this matter.

Very truly yours,

  
Rachel G. Peavy

RGP/msb  
Enclosure

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

J