

STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM ABBEVILLE COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Opinion No. 5387 (S.C. Ct. App. Filed March 2, 2016)
Appellate Case No. 2014-00946

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SC SUPREME COURT

Richard Wilson, Michael J. Antoniak, Jr., Marsha L. Antoniak,
Anita L. Belton, Prescott Darren Bosler, Johnny Calhoun, Sallie
Calhoun, Cynthia Gary, Robert Wayne Gary, Eugene P. Lawton,
Jr., Jeanette Norman, James Robert Shirley, Robert W. Spires,
Crystal Spires Wiley, Lewis S. Williams, Janie Wiltshire, Benjamin
Franklin Wofford, Jr., and Rebecca Hammond Wofford,Plaintiffs/Petitioners

v.

Laura B. Willis and Jesse A. Dantice, individually, and as
agents and/or brokers for Southern Risk Insurance Services LLC,
Travelers Casualty Insurance Company of America, Allied Property and
Casualty Insurance Co., Peerless Insurance Co., Montgomery Mutual
Insurance Co., Safeco Insurance Co. of America, and Foremost
Insurance Co., Southern Risk Insurance Services, LLC, Travelers
Casualty Insurance Co. of America, Allied Property and Casualty
Insurance Co., Peerless Insurance Co., Montgomery Mutual Insurance
Co., Safeco Insurance Co. of America, and Foremost Insurance Co, Laurie
Williams.....Defendants,

Of whom Peerless Insurance Co., Montgomery Mutual Insurance
Co., and Safeco Insurance Co. of America are.....Respondents

Of Whom Laurie Williams is.....Petitioner

MOTION FOR EXTENSION

The Petition for a Writ of Certiorari in this matter is currently due July 27, 2016. Pursuant to Rule 240, SCACR, Petitioners Richard Wilson, et al., respectfully request a five-day extension of time to file the Petition and Appendix, to and including August 1, 2016. Petitioners also ask that the Court hold the current deadline in abeyance until an Order is issued on this motion.

The Court has asked parties seeking extensions during the certiorari process to supply grounds for any requested extensions and to limit them to 20 days total. Order 2014-07-16-1. This is Petitioners' first request for an extension, and good cause exists for the request. Since the Court of Appeals denied rehearing in this case on June 27, 2016, Petitioners have retained new lead appellate counsel to seek review in this Court. This new counsel has been responsible for significant professional commitments and briefing deadlines in other cases during this time period, including the Brief in Opposition in the U.S. Supreme Court, which was filed on July 11, 2016, in *FCA US LLC v. The Center for Auto Safety*, No. 15-1211. Particularly given these other commitments, the requested extension is necessary to ensure an adequate opportunity for Petitioners' new counsel to become familiar with the factual record and legal arguments in this case. Lastly, given that the requested extension is only for five days (including two weekend days), it will not significantly delay the Court's consideration of the Petition.

Pursuant to Rule 11, SCRCR, counsel for Petitioners certify they have consulted opposing counsel regarding this motion, and opposing counsel consented to the relief requested herein.

[SIGNATURE PAGE TO FOLLOW]

July 21, 2016

Respectfully submitted,



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Insurance Co., Peerless Insurance Co., Montgomery Mutual Insurance
Co., Safeco Insurance Co. of America, and Foremost Insurance Co, Laurie
Williams.....
...Defendants,

Of whom Peerless Insurance Co., Montgomery Mutual Insurance
Co., and Safeco Insurance Co. of America are.....Respondents

Of Whom Laurie Williams is.....Petitioner

PROOF OF SERVICE

I, the undersigned legal assistant with the law offices of Hite and Stone, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) herein below specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

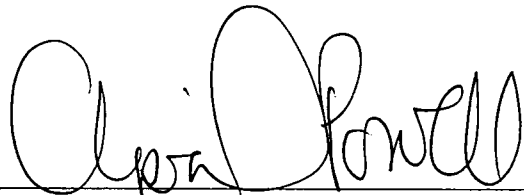
Pleadings: Motion for Extension

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July 21, 2016