

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Paul M. Burch, Circuit Court Judge

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JUL 09 2015

SC Court of Appeals

Appellate Case No. 2015-000806

Ard Trucking Company Respondent,

v.

Travelers Property Casualty Company
of America d/b/a The Travelers Indemnity
Company of Illinois, Appellant. Appellant.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

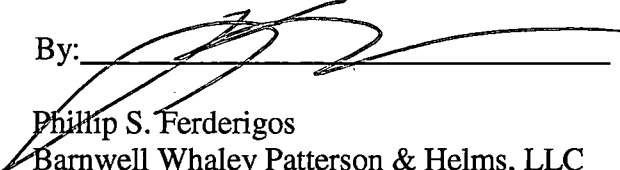
Barnwell Whaley Patterson & Helms, LLC
Phillip S. Ferderigos, Esquire
P.O. Drawer H
Charleston, SC 29401
843-577-7700
Attorney for Appellant

Driggers & Moyd
Martin S. Driggers, Sr., Esquire
P.O. Box 1439
Hartsville, SC 29551
843-332-5151
Attorney for Respondent

Comes now the Appellant Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois (hereinafter "Appellant") and respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR for a thirty (30) day extension of time in which to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal. Appellant received the Transcript of Record on June 29, 2015 which would cause the Initial Brief to be due on or before July 29, 2015. Counsel for the Appellant will be out of the country from July 9, 2015 to August 2, 2015; therefore, Appellant requests a thirty day extension to August 28, 2015 to file its Initial Brief. This motion is not made for the purpose of undue delay. Counsel for the Respondent has consented to this request as evidenced by Consent attached as Exhibit "A."

Accordingly, Appellant requests an Order extending the time to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal by thirty (30) days, or until August 28, 2015.

Respectfully submitted,

By: 

Phillip S. Ferderigos
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401
P.O. Drawer H (29402)
(843) 577-7700
Counsel for the Appellant

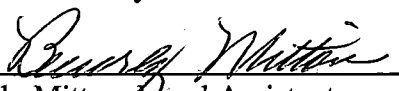
Dated: July 7, 2015

I hereby certify that on the 17th day of July, 2015, I mailed a copy of the foregoing

Motion to counsel of Record, with sufficient postage, properly addressed as follows:

Driggers & Moyd
Martin S. Driggers, Sr., Esquire
P.O. Box 1439
Hartsville, SC 29551
Attorney for Respondent

Barnwell Whaley Patterson & Helms, LLC

By: 
Beverly Mitton, Legal Assistant

THE STATE OF SOUTH CAROLINA
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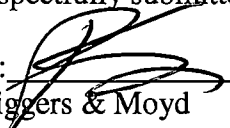
CONSENT TO MOTION OF APPELLANT FOR EXTENSION OF TIME TO FILE INITIAL
BRIEF AND DESIGNATION OF MATTER

Barnwell Whaley Patterson & Helms, LLC
Phillip S. Ferderigos, Esquire
P.O. Drawer H
Charleston, SC 29401
843-577-7700
Attorney for Appellant

Driggers & Moyd
Martin S. Driggers, Sr., Esquire
P.O. Box 1439
Hartsville, SC 29551
843-332-5151
Attorney for Respondent

I, Martin S. Driggers, Counsel for the Respondent, hereby consent to Appellant's Motion
for Extension of Time to File Initial Brief of Appellant and Designation of Matter.

Respectfully submitted,

By:  *for Martin Driggers with*
Driggers & Moyd *express written*
Martin S. Driggers, Sr., Esquire *permission*
P.O. Box 1439
Hartsville, SC 29551
843-332-5151
Attorney for Respondent

Dated: July 7, 2015



Phillip S. Ferderigos, Partner
PFerderigos@barnwell-whaley.com

July 7, 2015

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

RE: Ard Trucking Company, Respondent
v.
Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois, Appellant
Appellate Court Case No. 2015-000806

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the Motion for Extension of Time to File Initial Brief of Appellant and Designation of Matter as well as our check for \$25. Please file the original and return the clocked copy to me in the envelope provided herein.

Thank you for your assistance.

With kind regards,



Phillip S. Ferderigos

Cc: Martin S. Driggers, Sr., Esq.

PSF/bbm

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**BARNWELL
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PATTERSON & HELMS LLC

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The Honorable Jenny Abbott Kitchings

Clerk of the South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

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