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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

AUG 24 2016

SC Court of Appeals

APPEAL FROM DARLINGTON COUNTY  
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792

State Farm Mutual Automobile  
Insurance Company, ..... Respondent,

v.

Beverly Goyeneche, David R. Gray, III,  
and Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),  
individually and as Parent and Natural Guardian of S.G., ..... Defendants,

of whom

Beverly Goyeneche and Amanda  
Goyeneche are ..... Appellants.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, appellants request a 30-day extension of the deadline for filing their initial brief and designation of matter to be included in the record on appeal. The current deadline is August 24, 2016. This is the first request for an extension of this deadline.

/Signature page attached

August 24, 2016

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John S. Nichols", written over a horizontal line.

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Attorneys for Appellants

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served  
counsel with a copy of the *Motion for Extension* by mailing copies of the same by United  
States Mail with first class postage prepaid to the following address:

Jonathan M. Robinson  
DuBose-Robinson, PC  
PO Drawer 39  
Camden, SC 29021-0039

  
Erin Bridges

August 24, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

August 24, 2016

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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RE: State Farm v. Goyeneche et. al.  
Case Tracking No.: 2016-000840

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in regards to this case. I have also enclosed a proof of service of this document upon counsel for Respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Karl H. Smith, Esquire  
Jonathan M. Robinson, Esquire