

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge  
Civil Action No. 2013-CP-10-6771

**RECEIVED**

AUG 24 2016

SC Court of Appeals

Appellate Case No. 2006-001359

MI Windows and Doors, LLC, f/k/a MI Windows &  
Doors, Inc., f/k/a MI Home Products, Inc., ..... Plaintiff,

v.

National Union Fire Insurance Company of Pittsburgh,  
Pa., and Commerce and Industry Insurance Co., ..... Appellants,

v.

Liberty Mutual Fire Insurance Co., and Zurich American  
Insurance Co. & American Zurich Insurance Co.,

Of whom Liberty Mutual Fire Insurance Co. is the, ..... Respondent.

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

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

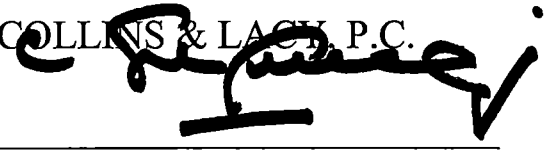
Pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, Counsel for Appellants National Union Fire Insurance Company of Pittsburgh, Pa. and Commerce & Industry Insurance Co. and Commerce & Industry Insurance Co. respectfully moves for an extension of time to file Appellants' Initial Brief and Designation of Matter. Counsel represents to the Court that a second extension is sought due to the complexities and substance of the case at bar, which necessitates additional time and effort to be expended by appellate counsel in order to complete the briefing. As well, due to a sizeable caseload in the trial courts, appellate counsel has maintained an active schedule within the last 30 days, which has in turn precluded his ability to complete the briefing. The Initial Brief and Designation of Matter are due on August 24, 2016. Counsel respectfully requests a thirty (30) day extension of time. Accordingly the Initial Brief and Designation of Matter would be due on September 23, 2016.

Counsel appreciates the Court's attention and its accommodation regarding the request.

[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.



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ATTORNEYS FOR APPELLANTS

Columbia, South Carolina  
August 24, 2016

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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Insurance Co. & American Zurich Insurance Co.,

Of whom Liberty Mutual Fire Insurance Co. is the, ..... Respondent.

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**PROOF OF SERVICE**

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Counsel for Appellants National Union Fire Insurance Company of  
Pittsburgh, Pa., and Commerce and Industry Insurance Co., certifies (s)he has  
served it's Second Motion for Extension of Time to File Initial Brief and

Designation of Matter on all parties by depositing a copy of it in the United States Mail, postage prepaid, on August 24, 2016, addressed to the following attorneys of record:

**COUNSEL SERVED**

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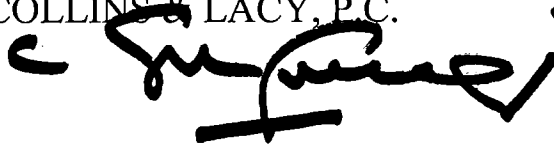
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[SIGNATURE PAGE TO FOLLOW]

Respectfully submitted,

COLLINS & LACY, P.C.



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SC Court of Appeals

August 24, 2016

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**Re: *MI Windows and Doors, LLC v. National Union Fire Insurance Co. of Pittsburgh, PA, et al.***  
***Appellate Case No. 2016-001359***  
***Claim No. 7171669871-US***  
***C&L File No. 000001-02197***

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of the Second Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced matter along with the firm's check in the amount of \$25.00 to cover the fees associated with filing this motion. Please return a filed, stamped copy of the Second Motion for Extension of Time to File Initial Brief and Designation of Matter to us via our courier.

Thank you for your time and attention. Should you have any questions, please do not hesitate to contact me.

Respectfully,  


Christian Stegmaier

CS/tmj  
Enclosures

cc: All Counsel of Record