

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

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C.A. No.: 2011-CP-10-00387

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PCS Nitrogen, Inc. .... Appellant,

vs.

Continental Casualty Company, Admiral Insurance Company,  
United States Fire Insurance Company, ACE Property & Casualty  
Insurance Company, Certain Underwriters at Lloyd's London, the  
Aviva Companies, the Winterthur Companies, Certain London  
Market Insurance Companies, Providence Washington Insurance  
Company (as Successor in Interest by way of Merger to Seaton  
Insurance Company, f/k/a Unigard Security Insurance, f/k/a  
Unigard Mutual Insurance Company), Berkshire Hathaway Specialty  
Insurance Company (f/k/a Stonewall Insurance Company),  
Lexington Insurance Company, Starr Indemnity & Liability  
Company (f/k/a Republic Insurance Company), First State Insurance  
Company, Century Indemnity Company (f/k/a California Union  
Insurance Company and Insurance Company of North America)..... Respondents.

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**MOTION FOR EXTENSION OF TIME**

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Appellant PCS Nitrogen, Inc. hereby requests this Honorable Court grant an extension of time in which to file its Reply. Respondents filed their Joint Initial Brief and Joint Designation of Matter on August 26, 2016, and under the SCACR, the deadline to file Appellant's Reply is September 5, 2016. Counsel for all Respondents have consented to this extension request.

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SC Court of Appeals

Therefore, Appellant respectfully asks that the Court extend the deadline to file its Reply by ten (10) days, making the new deadline September 15, 2016.

August 29, 2016

Respectfully submitted,

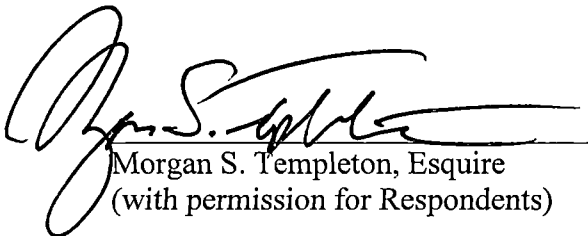


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Morgan S. Templeton, Esquire  
(with permission for Respondents)

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM CHARLESTON COUNTY  
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Case No. 2011-CP-10-00387

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SC Court of Appeals

Appellate Case No.: 2016-001140

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PCS Nitrogen, Inc. .... Appellant,

vs.

Continental Casualty Company, Admiral Insurance Company,  
United States Fire Insurance Company, ACE Property & Casualty  
Insurance Company, Certain Underwriters at Lloyd's London, the  
Aviva Companies, the Winterthur Companies, Certain London  
Market Insurance Companies, Providence Washington Insurance  
Company (as Successor in Interest by way of Merger to Seaton  
Insurance Company, f/k/a Unigard Security Insurance, f/k/a  
Unigard Mutual Insurance Company), Berkshire Hathaway Specialty  
Insurance Company (f/k/a Stonewall Insurance Company),  
Lexington Insurance Company, Starr Indemnity & Liability  
Company (f/k/a Republic Insurance Company), First State Insurance  
Company, Century Indemnity Company (f/k/a California Union  
Insurance Company and Insurance Company of North America)..... Respondents.

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**PROOF OF SERVICE**

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I certify that I have served Appellant's Motion for Extension of Time on all attorneys of record by depositing a copy of it in the United States Mail, postage prepaid, on August 29, 2016, addressed to all attorneys as shown below:

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SC Court of Appeals

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August 29, 2016

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

Re: PCS Nitrogen, Inc., Appellant v. Continental Casualty Company, et al., Respondents  
Appellate Case No. 2016-001140  
HSB File No. 35894-2

Dear Ms. Kitchings:

Enclosed herewith for filing, please find an original and one copy of the following:

- (1) Appellant's Motion for Extension of Time; and
- (2) Proof of Service.

Please return the file-stamped copy of Appellant's Motion for Extension of Time and Proof of Service to me in the enclosed envelope.

Thank you for your attention to this matter.

Very truly yours,



Wm. Howell Morrison

WHM/kmg

Enclosures

cc: Attorneys of Record (by U.S. Mail)

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Honorable Jenny Abbott Kitchings

Clerk, South Carolina Court of Appeals

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