

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM ANDERSON COUNTY
Court Of Common Pleas

SEP 15 2016

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

SC Court of Appeals

Case No: 2016-000867

Darhyl Taylor, as the Personal Representative
of the Estate of Ruth T. Simpson.....Respondent,

v.

Johnson & Johnson Preferred Financing, ProCentury Insurance Company, FINCO
Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association,
Dealers Risk and Insurance Services, Independent Dealers Insurance
Management..... Defendants,

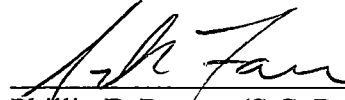
Of Whom ProCentury Insurance Company is theAppellant.

**MOTION FOR EXTENSION
OF TIME TO FILE APPELLANT'S INITIAL BRIEF**

Appellant, ProCentury Insurance Company, by and through its undersigned counsel,
hereby moves this Honorable Court for an extension of time in which to file its Initial Brief,
which response is currently due on September 21, 2016. Appellant requests an additional thirty
(30) days in which to file its Initial Brief, making its Initial Brief due on October 21, 2016. This
deadline has not previously been extended, nor would this extension affect any other deadlines.
This extension is necessary due to Appellant's counsel's schedule which requires him to be out
of the country for several weeks.

The undersigned counsel for Appellant has communicated with counsel for Respondent and Respondent's counsel consents to Appellant's request for this extension.

Respectfully submitted,



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Nicholas A. Farr (S.C. Bar No. 78769)
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Attorney for Appellant,
ProCentury Insurance Company

Greenville, SC

September 13, 2016

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Dealers Risk and Insurance Services, Independent Dealers Insurance
Management..... Defendants,

Of Whom ProCentury Insurance Company is theAppellant.

PROOF OF SERVICE

I certify that I served copies of Appellant's Motion for Extension of Time to File
Appellant's Initial Brief by United States Mail, postage prepaid, addressed to:

Mr. Steven M. Krause
Mr. Timothy A. Nowacki
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Greenville, SC
September 13, 2016

Attorneys for Appellant,
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SC Court of Appeals

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

Re: Darhyl Taylor, as personal representative of the Estate of Ruth T. Simpson v. Johnson & Johnson Preferred Financing, ProCentury Insurance Company, FINCO Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association, Dealers Risk and Insurance Services, Independent Dealers Insurance Management
Appellate Case No.: 2016-000867

Dear Ms. Kitchings:

Enclosed for filing please find the originals and six (6) copies each of Motion for Extension of Time to File Appellant's Initial Brief and Proof of Service in the above-referenced matter. Also enclosed is our firm check in the amount of \$25.00 for the filing fee. I would appreciate your filing the original documents, clocking the copies thereof and returning them to me in the enclosed envelope.

By copy of this letter, I am serving counsel of record with a copy of these documents.

Thank you for your assistance in this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,

GALLIVAN, WHITE & BOYD, P.A.

Nicholas A. Farr

cc: Mr. Steven M. Krause
Mr. Timothy A. Nowacki
Mr. Stephen L. Brown
Mr. Thomas L. Stephenson
Mr. William E. Booth, III
Ms. Vivian Cross

J

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09/13/2016

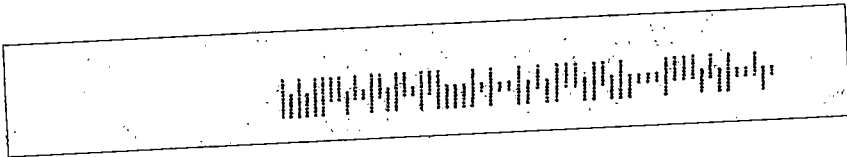
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