

81081

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

RECEIVED

SEP 26 2016

SC Court of Appeals

Case No. 2014-CP-15-135
Appeal No. 2016-001626

Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert"
Reeves Respondent/Appellant,
v.
South Carolina Municipal Insurance and Risk Financing Fund Appellant/Respondent.

CONSENT MOTION FOR EXTENSION OF TIME

W. Mullins McLeod, Jr.
Jacqueline LaPan Edgerton
McLEOD LAW GROUP
Post Office Box 21624
Charleston, SC 29413
Telephone: (843) 277-6655
Attorney for Respondent/Appellant

C. Mitchell Brown
Brian P. Crotty
Michael J. Anzelmo
Nelson, Mullins, Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211-1070
Telephone: 803-799-2000
Attorneys for Appellant/Respondent

COMES NOW Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert" Reeves, Respondent/Appellant, and by and with the consent of South Carolina Municipal Insurance and Risk Financing Fund, Appellant/Respondent, and respectfully moves this Honorable Court for an extension of time for both parties to file and serve Initial Response Briefs and Initial Replies in the cross appeals. Specifically, the Parties request the Initial Response Briefs be due on November 21, 2016 and, due to the subsequent Thanksgiving holiday, any Reply Briefs be due on December 5, 2016.

Respectfully submitted this 21st day of September 2016,



W. Mullins McLeod, Jr., SC Bar No. 14148
Jacqueline LaPan Edgerton, SC Bar No. 100920

McLEOD LAW GROUP
Post Office Box 21624
Charleston, SC 29413
Telephone: (843) 277-6655

Attorneys for Appellant

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

RECEIVED
SEP 26 2016
SC Court of Appeals

Case No. 2014-CP-15-135
Appeal No. 2016-001626

Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert"
Reeves Respondent/Appellant,
v.
South Carolina Municipal Insurance and Risk Financing Fund Appellant/Respondent.

PROOF OF SERVICE OF CONSENT MOTION FOR EXTENSION OF TIME

I, the undersigned paralegal of the law offices of McLeod Law Group LLC, attorneys for Respondent, Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert" Reeves, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) specified below by mailing a copy of the same by United States Mail, postage prepaid, to the following address:

Pleading: Consent Motion for Extension of Time
Counsel Served: NELSON MULLINS RILEY & SCARBOROUGH
C. Mitchell Brown
Brian Patrick Crotty
Michael J. Anzelmo
P.O. Box 11070
Columbia, SC 29211-1070

Brooke A. DiMeo

Brooke A. DiMeo, Paralegal

9/21, 2016

Direct Dial: 843-277-6656

Email: brooke@mcleod-lawgroup.com

September 21, 2016

South Carolina Court of Appeals
Jenny Abbott Kitchings, Clerk
PO Box 11629
Columbia, SC 29211

RECEIVED

SEP 26 2016

SC Court of Appeals

Re.: Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert"
Reeves, Respondent/Appellant v. South Carolina Municipal Insurance and Risk
Financing, Appellant/Respondent
Case No.: 2014-CP-15-135
Appeal No.: 2016-001626

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Consent Motion for Extension of Time in the above-referenced matter. Also enclosed, please find the Proof of Service and a check for the filing fee. Please file the original and return the filed to copy to me in the self-addressed, stamped envelope.

By copy of this correspondence and its enclosures, I hereby serve counsel for Appellant/Respondent with same.

With kind regards, I am

Sincerely,



Brooke A. DiMeo, paralegal to
Jacqueline LaPan Edgerton

/bad
Enclosures

cc: C. Mitchell Brown, Esquire

MLG

McLEOD
LAW GROUP LLC

P.O. Box 21624
Charleston, SC 29413

RECEIVED

SEP 26 2016

SC Court of Appeals

South Carolina Court of Appeals
Jenny Abbott Kitchings, Clerk
PO Box 11629
Columbia, SC 29211



02 1P
0006944909 SEP 21 2016
MAILED FROM ZIP CODE 29403
\$001.78⁰