

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Clayton B. McCullough, Esquire, Special Referee

Case No. 2016-000063

**RECEIVED**  
SEP 28 2016  
SC Court of Appeals

Anna Angelacci, as guardian of K.B., a minor, Respondent,

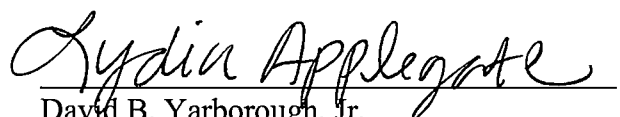
v.

E.U., a minor, Travis O. Felkel, and Ginger G. Ulery, Defendants.

Ex parte: Nationwide Mutual Fire Insurance Company, Appellant.

RESPONDENT'S MOTION FOR EXTENSION

Respondent, Anna Angelacci, as guardian of K.B., a minor, by and through the undersigned attorney, hereby requests a 30-day extension to file and serve Respondent's Final Brief. With the extension, the brief will be due on October 27, 2016.



David B. Yarborough, Jr.  
Lydia Blessing Applegate  
Douglas E. Jennings  
YARBOROUGH APPELGATE LLC  
291 East Bay Street, Floor 2  
Charleston, South Carolina 29401  
Phone: 843-972-0150  
Fax: 843-277-6691  
*Attorneys for Respondent*

9-26, 2016

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PROOF OF SERVICE

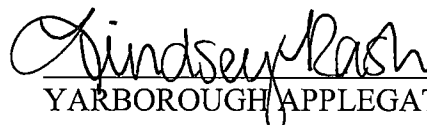
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I certify that I have served Respondent's Motion for Extension on counsel of record by depositing a copy of it in the United States Mail, postage prepaid, on September 26, 2016 addressed as follows:

Samuel R. Clawson, Esquire  
Christy R. Fagnoli, Esquire  
Clawson and Staubes, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492

Mark B. Tinsley, Esquire  
Gooding & Gooding, PA  
P.O. Box 1000  
Allendale, SC 29810

Shannon Jones, Esquire  
Shannon Jones Law, LLC  
3 State Street  
Charleston, SC 29401

  
YARBOROUGH APPEL GATE LLC



**YARBOROUGH  
APPLEGATE**  
ATTORNEYS AT LAW

Lydia Blessing Applegate  
lydia@yarboroughapplegate.com

September 26, 2016

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

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SEP 28 2016

SC Court of Appeals

Re: Ex Parte: Nationwide Mutual Fire Insurance  
In Re: Anna Angelacci  
Appellate Case No. 2016-000063  
Our File No. 14-062

Dear Ms. Kitchings:

Enclosed please find a motion requesting a 30-day extension to file and serve Respondent's Final Brief, as well as the \$25.00 motion fee. The parties have reached an agreement to settle this case, and a hearing to approve the settlement is scheduled for October 13, 2016. In order to ensure the settlement is approved prior to dismissal of the appeal, we are requesting an additional 30-day extension to take us beyond the settlement approval hearing.

Counsel for the Appellant has also moved for an extension and has consented to our motion. With this extension, Respondent's Final Brief will be due on October 27, 2016.

Sincerely,

Lydia Blessing Applegate

LBA:lnr

Enclosure

cc: Christy R. Fagnoli, Esquire  
Shannon Jones, Esquire  
Mark B. Tinsley, Esquire

✓



**YARBOROUGH  
APPLGATE**

ATTORNEYS AT LAW

291 East Bay Street / Floor 2  
Charleston, South Carolina 29401

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

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