

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

James R. Barber III, Circuit Court Judge
Letitia H. Verdin, Circuit Court Judge

RECEIVED
SEP 29 2016
SC Court of Appeals

Case No. 2014-CP-23-03422

Three Blind Mice, LLC
d/b/a The Blind Horse Saloon Respondent

v.

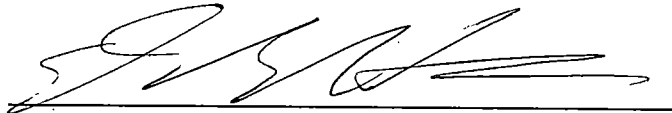
Colony Insurance Company Appellant

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF AND
DESIGNATION OF MATTER**

Appellant Colony Insurance Company, with the consent of Respondent, moves for a ten-day extension in which to file its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal. This is Appellant's first request for an extension and is based on good cause and not intended for purposes of delay, nor will the requested extension prejudice the rights of any party. In support of this motion, Appellant shows the Court that the Respondent's Initial Brief was mailed to

counsel for Appellant on September 14, 2016, but that the Respondent's Initial Brief was not received by counsel for Appellant until September 19, 2016. Pursuant to Rule 208, SCACR, the Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal would be due on September 26, 2016, without an extension of time, which would be less than five business days from the date that the Respondent's Initial Brief was received by counsel for the Appellant. By the undersigned's calculations, the extension, if granted, would extend the deadline for filing the Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal to the 4th day of October, 2016. Respondent has consented to this extension of time for the filing of the Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,



David G. Harris II S.C. (State Bar No. 101951)
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Goldberg Segalla LLP
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-and-

Eric K. Englebardt (S.C. State Bar No. 12892)
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Attorneys for Appellant Colony Insurance Company

September 26, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
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James R. Barber III, Circuit Court Judge
Letitia H. Verdin, Circuit Court Judge

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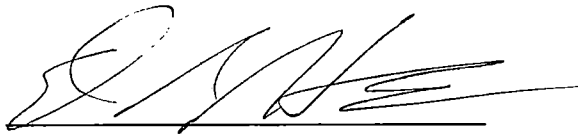
Colony Insurance Company Appellant

PROOF OF SERVICE

I, Eric K. Englehardt, of the law offices of Wilson & Englehardt, LLC, attorneys for Appellant, do hereby certify that I have served all parties to the appeal in this action with a copy of the MOTION FOR EXTENSION TO FILE APPELLANT'S INITIAL REPLY BRIEF AND DESIGNATION OF MATTER by mailing a copy of the same by U.S. Mail, postage pre-paid, to the following addresses:

William W. Wilkins
Andrew A. Mathias
Nexsen Pruet, LLC
55 East Camperdown Way, Suite 400
Greenville, South Carolina 29601
Telephone: 864.370.2211

*Attorneys for Respondent Three Blind Mice
d/b/a The Blind Horse Saloon*



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Attorneys for Appellant Colony Insurance Company

September 26, 2016.

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VIA FACSIMILE (803) 734-1839
AND U.S. FIRST CLASS MAIL

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

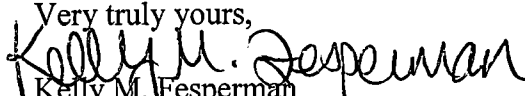
RE: *Three Blind Mice, LLC, d/b/a The Blind Horse Saloon*
v. Colony Insurance Company
Case No: 2014-CP-23-03422

Dear Ms. Kitchings:

Enclosed for filing, please find the following documents:

- (1) Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter (original and six copies); and
- (2) Proof of Service on the Respondent (original and six copies).

Kindly please return a clocked copy of the Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter to me in the self-addressed, stamped envelope enclosed. I have also enclosed a check in the amount of \$25.00 for the filing fee. By copy of this letter and Proof of Service, we are hereby serving all parties to the appeal.


Very truly yours,

Kelly M. Fesperman
Paralegal to David G. Harris II

/kf

Enclosures

cc: William W. Wilkins/Andrew A. Mathias



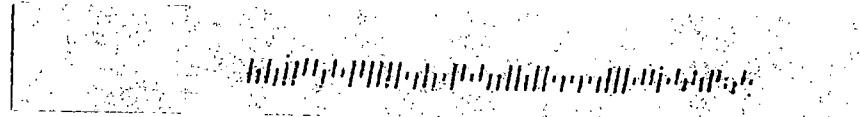
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SC Court of Appeals

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