

81260

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2015-CP-40-07254

RECEIVED
OCT 17 2016
SC Court of Appeals

Andrew P. Neumayer, Respondent,

v.

Philadelphia Indemnity Insurance Company,
Primary Colors Child Care Center, Jocelyn Knox
DeMartelare, and Asia N. Partman, Defendants,

of whom

Philadelphia Indemnity Insurance Company is Appellant.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, respondent requests a 30-day extension of the deadline for filing his initial brief and designation of matter to be included in the record on appeal. The current deadline is October 17, 2016. This is the first request for an extension of this deadline.

/Signature page attached

October 17, 2016

Respectfully submitted,

Blake A. Hewitt

BY CLYDE BENNETT
GOTTE, JR. w/
EXPRESS PERMISSION

Blake A. Hewitt, # 73674
John S. Nichols, # 4210
Bluestein, Nichols,
Thompson & Delgado, LLC
Post Office Box 7965
Columbia, South Carolina 29202
bhewitt@bntdlaw.com
jsnichols@bntdlaw.com
(803) 779-7599

Gerald E. Reardon, # 13739
Law Office of Jerry Reardon
PO Box 7464
Columbia, SC 29202
jerry@jerryreardonlaw.com
(803) 602-5242

Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

Case No. 2015-CP-40-07254

RECEIVED

OCT 17 2016

SC Court of Appeals

Andrew P. Neumayer, Respondent,

v.

Philadelphia Indemnity Insurance Company,
Primary Colors Child Care Center, Jocelyn Knox
DeMartelare, and Asia N. Partman, Defendants,

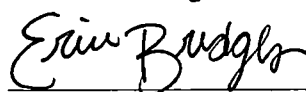
of whom

Philadelphia Indemnity Insurance Company is Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Appellant with a copy of the *Notice of Appearance* and *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Curtis W. Dowling
Matthew G. Gerrald
Barnes Alford Stork & Johnson, LLP
PO Box 8448
Columbia, SC 29202



Erin Bridges

October 17, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

October 17, 2016

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
OCT 17 2016
SC Court of Appeals

Re: Andrew P. Neumayer v. Philadelphia Indemnity
Case Tracking No. 2016-001710

Dear Ms. Kitchings:

Attorneys Blake Hewitt and John Nichols have been retained to assist as counsel for the Respondent in this case. Please find enclosed the original and one (1) copy of a request to notice their appearance. Also, please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in reference to the above matter. I have enclosed a proof of service of these documents on counsel for the Appellant and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to Blake A. Hewitt
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: Gerald E. Reardon, Esquire
Curtis W. Dowling, Esquire
Matthew G. Gerrald, Esquire