



Earhart Overstreet

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October 19, 2016

RECEIVED

OCT 20 2016

S.C. SUPREME COURT

VIA FEDERAL EXPRESS

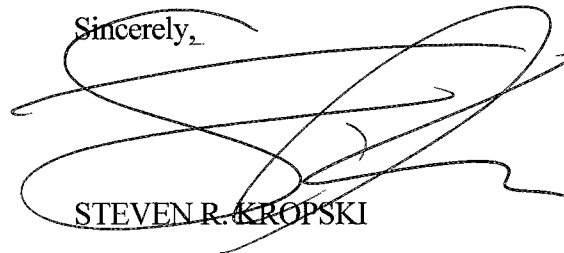
Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
1231 Gervais Street
Columbia, South Carolina 29201

Re: Sentry Select Insurance Company v. Maybank Law Firm, LLC, *et al.*
Appellate Case No.: 2016-001351
EO File No.: 110-0137

Dear Mr. Shearouse:

Enclosed for filing, please find the original and 6 copies of Defendant's *Motion for Extension* and *Proof of Service* in this case. By copy of this correspondence, I am serving a copy of the same upon all counsel of record. If you have any questions, please do not hesitate to contact me. With kind regards, I am

Sincerely,



STEVEN R. KROPSKI

SRK:tmm
Enclosures
cc: Daryl Hawkins, Esq.

THE STATE OF SOUTH CAROLINA
In the Supreme Court

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

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Appellate Case No. 2016-001351

OCT 20 2016

Sentry Select Insurance Company,
Plaintiff,

S.C. SUPREME COURT

Of whom Sentry Select Insurance Company is the,

Appellant,

v.

Maybank Law Firm, LLC and Roy P.
Maybank, Defendants,

of whom Roy P. Maybank and Maybank Law Firm, LLC
are the,

Respondents.

MOTION FOR EXTENSION

This motion is filed pursuant to Rule 240 of the South Carolina Appellate Court Rules, which governs motions and petitions generally.

Defendants respectfully request a 30-day extension of the deadline for filing and serving their brief. The current deadline is October 21, 2016. This is the first extension request for this deadline.

Because this case is a certified question and not a certiorari proceeding, the Defendants believe that an extension of this length would not come within those types of extension requests

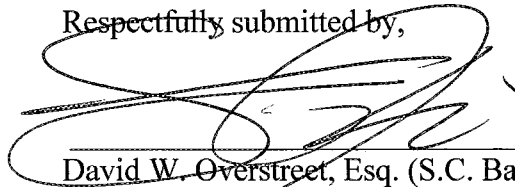
referenced in this Court's June 16, 2014 Order. See *RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2014 (Shearouse Adv. Sh. No. 28 at 1).

In support of this motion, Defendant's counsel would show that no prior extensions have been sought or granted in this matter, and counsel does not anticipate needing any further extensions. Due to the complexity and importance of the issues presented by these certified questions, additional time is needed to fully prepare its brief. Plaintiff will not be prejudiced by the requested 30 day extension.

WHEREFORE, Defendants respectfully request that the Court grant its motion for extension and extend its deadline to file its initial brief until November 21, 2016.

This 19th day of October 2016.

Respectfully submitted by,



David W. Overstreet, Esq. (S.C. Bar #16965)

Michael B. McCall, Esq. (S.C. Bar #73028)

Steven R. Kropski, Esq. (S.C. Bar # 101441)

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Attorneys for Maybank Law Firm, LLC and Roy P. Maybank

THE STATE OF SOUTH CAROLINA
In the Supreme Court

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

RECEIVED

Appellate Case No. 2014-001351

OCT 20 2016

Sentry Select Insurance Company,
Plaintiff,

S.C. SUPREME COURT

Of whom Sentry Select Insurance Company is the,

Appellant,

v.

Maybank Law Firm, LLC and Roy P.
Maybank, Defendants,

of whom Roy P. Maybank and Maybank Law Firm, LLC
are the,

Respondents.

PROOF OF SERVICE

I, Robert Eaton, an employee of Earhart Overstreet LLC, attorneys for Respondents Maybank Law Firm, LLC and Roy P. Maybank, certify that I served a copy of the attached *Motion for Extension* by depositing a copy of it in the Federal Express Overnight Delivery, postage prepaid, on October 19, 2016, addressed to Appellant Sentry Select Insurance Company's attorney of record, Daryl Hawkins of Law the Offices of Daryl Hawkins, located at 1331 Elmwood Avenue, Suite 305, Columbia, South Carolina 29201-2150.

October 19, 2016



Robert Eaton

