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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**

NOV 15 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.

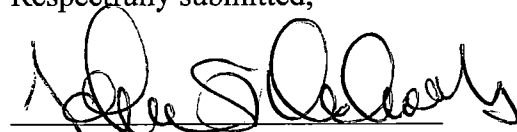
**MOTION FOR EXTENSION**

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 November 16, 2016. This is the second request for an extension of this deadline.

/Signature page attached

November 15, 2016

Respectfully submitted,



Blake A. Hewitt, # 73674

John S. Nichols, # 4210

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Attorneys for Respondent

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**PROOF OF SERVICE**

The undersigned hereby certifies that on the date indicated below she served  
counsel for the Appellant with a copy of the *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

November 15, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

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SC Court of Appeals

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**VIA HAND DELIVERY**

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

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

Dear Ms. Kitchings:

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 John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

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