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THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner III, Circuit Court Judge

Case No. 2014-CP-15-135

Appellate Case No. 2016-001626

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NOV 14 2016

SC Court of Appeals

Ashley Reeves as Personal Representative for the Estate of
Albert Carl "Bert" Reeves,.....

Respondent/
Appellant,

v.

South Carolina Municipal Insurance and Risk Financing
Fund,

Appellant/
Respondent.

CONSENT MOTION FOR EXTENSION OF TIME

COMES NOW Appellant/Respondent South Carolina Municipal Insurance and Risk Financing Fund, and by and with the consent of Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert" Reeves, Respondent/Appellant, respectfully moves this Honorable Court for an extension of time, due to other work deadlines and the Thanksgiving holiday travel, for both parties to file and serve Initial Replies in the cross appeals. The Initial Replies are currently due on December 1, 2016. Specifically, the Parties request the Initial Reply Briefs deadline be extended to December 5, 2016.

Respectfully submitted,

SIGNATURE PAGE ATTACHED

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

C. Mitchell Brown
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1320 Main Street / 17th Floor
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Columbia, South Carolina 29201
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Attorneys for Appellant/Respondent

Columbia, South Carolina

11/11, 2016

WE CONSENT:

By: 

W. Mullins McLeod, Jr.
Jacqueline LaPan Edgerton
McLEOD LAW GROUP
Post Office Box 21624
Charleston, SC 29413
(843) 277-6655

*with permission
By BL*

Attorneys for Respondent/Appellant

Charleston, South Carolina

11/11, 2016

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

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SC Court of Appeals

Ashley Reeves as Personal Representative for the Estate of Albert Carl "Bert" Reeves, Respondent,

v.

South Carolina Municipal Insurance and Risk Financing Fund, Appellant.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant South Carolina Municipal Insurance and Risk Financing Fund ("SCMIRF"), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **CONSENT MOTION FOR EXTENSION OF TIME**

Counsel Served: **U.S. Mail**
W. Mullins McLeod, Jr., Esquire
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Lisa P. Whitehurst
Administrative Assistant

November 14, 2016

Nelson Mullins

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November 14, 2016

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SC Court of Appeals

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

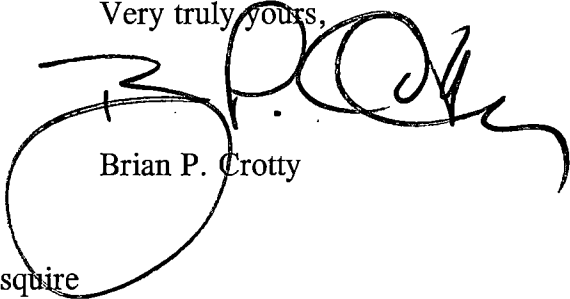
RE: Ashley Reeves, as Personal Representative for the Estate of Albert Carl "Bert" Reeves
v. South Carolina Municipal Insurance and Risk Financing Fund
Appellate Case No. 2016-001626
Our File No. 20848/01500

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of a Consent Motion for Extension of Time. We ask that you file the original and return a clocked-in copy to us via our courier. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

By copy of this letter to counsel of record, we are serving them with a copy of this motion.

Very truly yours,


Brian P. Crotty

BPC:rd

Enclosures

cc: W. Mullins McLeod, Jr., Esquire
Jacqueline LaPan Edgerton, Esquire