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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court Of Common Pleas

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

Case No: 2016-000867

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NOV 18 2016

SC Court of Appeals

Darhyl Taylor, as the Personal Representative
of the Estate of Ruth T. SimpsonRespondent,

v.

Johnson & Johnson Preferred Financing, ProCentury Insurance Company, FINCO
Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association,
Dealers Risk and Insurance Services, Independent Dealers Insurance
Management..... Defendants,

Of Whom ProCentury Insurance Company is theAppellant.

**MOTION FOR EXTENSION
OF TIME TO FILE RESPONDENT'S INITIAL BRIEF**

Respondent Darhyl Taylor, as the Personal Representative of the Estate of Ruth T. Simpson, by and through his undersigned counsel, hereby moves this Honorable Court for an extension of time in which to file his Initial Brief, which is currently due on November 21, 2016. Respondent requests an additional thirty (30) days in which to file his Initial Brief, making it due on December 21, 2016. This deadline has not previously been extended, nor would this extension affect any other deadlines. This extension is necessary due to Respondent's counsel's schedule which requires him to appear in court, depositions and hearings. Additionally, Respondent's counsel has been out of town on vacation.

The undersigned counsel for Respondent has communicated with counsel for Appellant and Appellant's counsel consents to Respondent's request for this extension.

Respectfully submitted,

KRAUSE, MOORHEAD & DRAISEN, P.A.



STEVEN M. KRAUSE, SC Bar# 03571

TIMOTHY A. NOWACKI, SC Bar# 100967

207 East Calhoun Street

Anderson, South Carolina 29621

(864) 225-4000

tnowacki@kmdlawyers.com

Attorneys for the Respondent

November 14, 2016.

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Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association,
Dealers Risk and Insurance Services, Independent Dealers Insurance
Management Defendants,

Of Whom ProCentury Insurance Company is the Appellant.

PROOF OF SERVICE

I certify that I served copies of Respondent's Motion for Extension of Time to File
Respondent's Initial Brief by United States Mail, postage prepaid, addressed to:

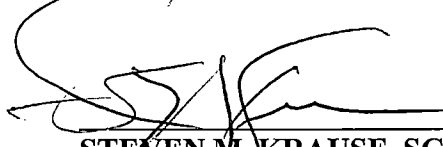
Mr. Phillip E. Reeves
Mr. Nicholas A. Farr
Gallivan, White & Boyd, P.A.
P. O. Box 10589
Greenville, South Carolina 29601

Mr. Stephen L. Brown
Young Clement Rivers, LLP
Post Office Box 993
Charleston, South Carolina 29402-9993

Mr. Thomas L. Stephenson
Stephenson & Murphy, LLC
207 Whitsett Street
Greenville, South Carolina 29601

Mr. William E. Booth, III
Booth Law Firm, LLC
3231 Sunset Boulevard, Suite A
West Columbia, South Carolina 29169

KRAUSE, MOORHEAD & DRAISEN, P.A.



STEVEN M. KRAUSE, SC Bar# 03571
TIMOTHY A. NOWACKI, SC Bar# 100967
207 East Calhoun Street
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The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

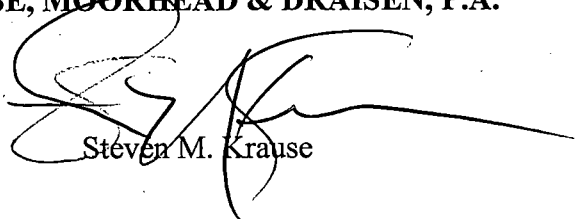
RE: Darhyl Taylor, as personal representative of the Estate of Ruth T. Simpson v. Johnson & Johnson Preferred Financing, ProCentury Insurance company, FINCO Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association, Dealers Risk and Insurance Services, Independent Dealers Insurance Management – Case No.: 2016-000867

Dear Ms. Kitchings:

Enclosed please find the Respondent's Motion for Extension of Time to File Respondent's Initial Brief, along with my Proof of Service for same and the \$25.00 filing fee for the above-referenced matter. I have this date also served all counsel of record for the Appellants with a copy of same.

With kind regards,

KRAUSE, MOORHEAD & DRAISEN, P.A.



Steven M. Krause

SMK/dh
Enclosure


cc: Phillip E. Reeves, Esq.
Nicholas A. Farr, Esq.
Stephen L. Brown, Esq.
Thomas L. Stephenson, Esq.
William E. Booth, III, Esq.

KMD
LAWYERS

KRAUSE MOORHEAD & DRAISEN, P.A.
207 East Calhoun Street
Anderson, South Carolina 29621

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