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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792
Appellate Case No. 2016-000840

RECEIVED
NOV 17 2016
SC Court of Appeals

State Farm Mutual Automobile
Insurance Company Respondent,

Beverly Goyeneche, David R. Gray, III and
Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),
Individually and as Parent and Natural Guardian of S.G., Defendants

Of whom
Beverly Goyeneche and Amanda Goyeneche are Appellants

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondent, requests a 30-day extension of the deadline for filing its initial brief and designation of matter to be included in the record on appeal. The current deadline is November 28, 2016. This is the first request for an extension of this deadline.

(signature page to follow)

DuBOSE-ROBINSON, PC

BY: 

Jonathan M. Robinson, Esquire, Bar No. 68285

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Columbia, South Carolina

November 17, 2016

ATTORNEYS FOR RESPONDENT

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Individually and as Parent and Natural Guardian of S.G., Defendants


Of whom
Beverly Goyeneche and Amanda Goyeneche are Appellants

PROOF OF SERVICE

The undersigned hereby certified that on the date indicated below she served counsel
with a copy of the Motion for Extension by mailing copies of the same by United States Postal
Service with first class postage prepaid to the following address:

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Columbia, South Carolina
November 17, 2016

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REPLY TO: Mailing Address
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Camden, SC 29021

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2725 Devine St.
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Telephone: 803-254-5445

November 17, 2016

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VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: *State Farm Mutual Automobile Insurance Company v. Beverly Goyeneche, David R. Gray, III and Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray), individually and as Parent and Natural Guardian of Sophia Goyeneche-Gray*
Civil Action No.: 2014-CP-16-0792
Case Tracking No.: 2016-000840

Dear Ms. Kitchings:

Please find enclosed herewith for filing the original and seven (7) copies of a Motion for Extension in regards to the above-referenced case. I have also enclosed a Proof of Service of this document upon counsel for Defendants/Appellants and a check in the amount of \$25.00 which represents the filing fee. Please return the additional filed copies to me via our courier.

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

Very truly yours,

DuBOSE-ROBINSON, PC

Jonathan M. Robinson

JMR/scc
Enclosures

cc: John S. Nichols, Esquire
Karl H. Smith, Esquire

J