

81924

RECEIVED

DEC 16 2016

SC Court of Appeals

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

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 December 16, 2016. This is the third request for an extension of this deadline.

Respondent's counsel posits the following extraordinary circumstances supporting this request:

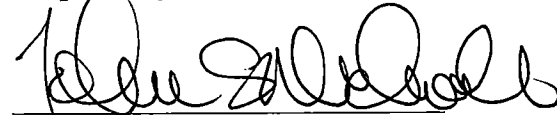
- A. Counsel is continuing to deal with a family illness in Florence, South Carolina (Counsel will provide details upon request);
- B. Counsel has been working with the Supreme Court's Uniform Bar Exam Task Force

preparing for implementation of the UBE in February 2017 as well as finalizing the videos for the South Carolina component for admission under the UBE. This effort has taken an unexpected and inordinate amount of time;

- C. Counsel is catching up from delays in work schedule resulting from Hurricane Matthew in October 2016;
- D. Until November 15, 2016, Counsel was a candidate for judicial office, which also took an unexpected and inordinate amount of time.

December 16, 2016

Respectfully submitted,



John S. Nichols, # 4210  
Blake A. Hewitt, # 73674  
Bluestein, Nichols,  
Thompson & Delgado, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202  
jsnichols@bntdlaw.com  
bhewitt@bntdlaw.com  
(803) 779-7599

Gerald E. Reardon, # 13739  
Law Office of Jerry Reardon  
PO Box 7464  
Columbia, SC 29202  
jerry@jerryreardonlaw.com  
(803) 602-5242

Attorneys for Respondent

RECEIVED

DEC 16 2016

SC Court of Appeals

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

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.

**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

December 16, 2016



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

RECEIVED  
DEC 16 2016  
SC Court of Appeals

December 16, 2016

**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 Blake A. Hewitt  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

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