

82069

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JAN 03 2017

SC Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court Of Common Pleas

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

Case No: 2016-000867

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

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 the Appellant.

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

Appellant, ProCentury Insurance Company, by and through its undersigned counsel,
hereby moves this Honorable Court for an extension of time in which to file its Initial Brief,
which response is currently due on January 3, 2017. Appellant requests an additional ten (10)
days in which to file its Initial Reply Brief, making its Initial Brief due on January 13, 2017.
This deadline has not previously been extended, nor would this extension affect any other
deadlines. This extension is necessary due to Appellant's counsel's schedule which requires him
to be out of the office for an extended period over the holidays.

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

Respectfully submitted,



Phillip E. Reeves (S.C. Bar No. 4672)
Nicholas A. Farr (S.C. Bar No. 78769)
GALLIVAN, WHITE & BOYD, P.A.
P. O. Box 10589
Greenville, South Carolina 29601
(864) 271-9580
(864) 271-7502 (fax)

Attorney for Appellant,
ProCentury Insurance Company

Greenville, SC

December 30, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM ANDERSON COUNTY
Court Of Common Pleas

JAN 03 2017

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

SC Court of Appeals

Case No: 2016-000867

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.

PROOF OF SERVICE

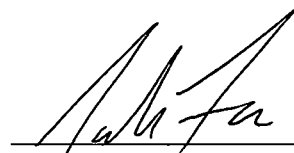
I certify that I served copies of Appellant's Motion for Extension of Time to File
Appellant's Initial Reply Brief by United States Mail, postage prepaid, addressed to:

Mr. Steven M. Krause
Mr. Timothy A. Nowacki
Krause, Moorhead & Drasien, P.A.
207 E. Calhoun Street
Anderson, South Carolina 29621

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 29169



Phillip E. Reeves (S.C. Bar No. 4672)
Nicholas A. Farr (S.C. Bar No. 78769)
GALLIVAN, WHITE & BOYD, P.A.
P. O. Box 10589
Greenville, SC 29603
(864) 271-9580

Greenville, SC
December 30, 2016

Attorneys for Appellant,
ProCentury Insurance Company

Nick Farr
A member of the South Carolina Bar
Direct 864.271.5347
NFarr@GWBlawfirm.com



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW

55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601
Telephone 864.271.9580
Facsimile 864.271.7502
www.GWBlawfirm.com

December 30, 2016

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

RECEIVED
JAN 03 2017
SC Court of Appeals

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
Appellate Case No.: 2016-000867

Dear Ms. Kitchings:

Enclosed for filing please find the originals and six (6) copies each of Motion for Extension of Time to File Appellant's Initial Reply Brief and Proof of Service in the above-referenced matter. Also enclosed is our firm check in the amount of \$25.00 for the filing fee. I would appreciate your filing the original documents, clocking the copies thereof and returning them to me in the enclosed envelope.

By copy of this letter, I am serving counsel of record with a copy of these documents.

Thank you for your assistance in this matter. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,

GALLIVAN, WHITE & BOYD, P.A.

Nicholas A. Farr

cc: Mr. Steven M. Krause
Mr. Timothy A. Nowacki
Mr. Stephen L. Brown
Mr. Thomas L. Stephenson
Mr. William E. Booth, III

✓

neopost

FIRST-CLASS MAIL

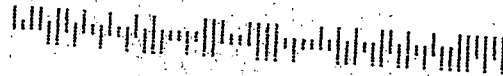
12/30/2016

US POSTAGE

\$01.99⁰⁰



ZIP 29601
041L11228956



Gallivan, White & Boyd, P.A.

ATTORNEYS AT LAW

55 Beattie Place, Suite 1200
Post Office Box 10589 (29603)
Greenville, South Carolina 29601

The Honorable Jenny Abbott Kitching
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

JAN 03 2017

SC Court of Appeals