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JAN 17 2017

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 January 17, 2017. This is the fourth request for an extension of this deadline.

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

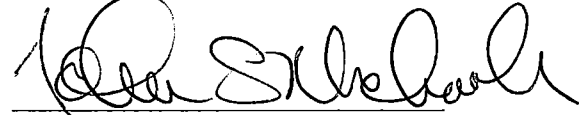
- A. Counsel has been dealing with on-going family illness outside of Columbia, which has required some unexpected travel.
- B. Counsel is employed by the South Carolina General Assembly as special counsel to



the ethics committees and has encountered an unexpected workload due to unscheduled meetings of the House Ethics Committee.

January 17, 2017

Respectfully submitted,



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Attorneys for Respondent

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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

January 17, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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SC Court of Appeals

January 17, 2017

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 John S. Nichols
BLUESTEIN, NICHOLS,
THOMPSON & DELGADO, LLC

/emb

Enclosures

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