

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 01 2017

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

The Honorable L. Casey Manning, Circuit Court Judge

Civil Action No. 2015-CP-40-07254

Andrew P. Neumayer.....Respondent,

v.

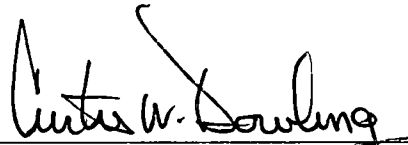
Philadelphia Indemnity Insurance Company,
Primary Colors Child Care Center, Jocelyn Knox
DeMartelare, and Asia N. Partman..... Defendants,

Of Whom Philadelphia Indemnity Insurance Company isAppellant.

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF

Pursuant to Rules 263(b) and 240, SCACR, the undersigned counsel for Appellant respectfully requests a ten (10) day extension of the deadline for filing Appellant's Reply Brief, which is currently due March 3, 2017 (assuming the court accepts Respondent's Initial Brief out of time). With the extension, the new deadline would be March 13, 2017. The grounds for this request are that, given the other demands of their practice, counsel for Appellant require additional time to review Respondent's Initial Brief and prepare Appellant's Reply Brief. The undersigned has consulted with John S. Nichols, Esquire, counsel for Respondent, who indicated he has no objection to this request.





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March 1, 2017

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PROOF OF SERVICE

I, the undersigned employee of Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on March 1, 2017 served copies of the **MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** by depositing copies of the documents in the United States Mail, sufficient postage prepaid, with the return address clearly noted, addressed as follows:

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