

THE SOUTH CAROLINA COURT OF APPEALS

Stephany A. Connelly and James M. Connell, Plaintiffs

RECEIVED

v.

JAN 04 2018

The Main Street America Group; Old Dominion Insurance Company; Allstate Fire and Casualty Insurance Company; Debbie Cohn; and Freya Trozona, Defendants

SC Court of Appeals

Of whom, Allstate Fire and Casualty Insurance Company; The Main Street America Group; and Old Dominion Insurance Company are the Appellants,

And

Stephany A. Connelly and James M. Connelly are the Respondents.

Appellate Case No. 2017-002234

The Honorable Jocelyn Newman  
Richland County  
Trial Court Case No. 2016CP4005885

---

**APPELLANT ALLSTATE FIRE AND CASUALTY INSURANCE COMPANY'S  
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

---

Appellant Allstate Fire and Casualty Insurance Company ("Appellant") by and through its undersigned counsel respectfully requests a ten (10) day extension of time to file Appellant's Initial Brief. The reason for this request is in part due to the complexity of Appellant's Initial Brief, as well as the convergence of court mandated deadlines in other cases. Counsel for both Respondents Stephany and James Connelly and Appellants The Main Street American Group and Old Dominion Insurance Company have consented to this extension.

For the above-stated reasons, on behalf of Appellant, I respectfully request the Court grant Appellant a ten (10) day extension of time. If this Motion is granted, the Appellant's Initial Brief will be due on or before January 18, 2018.

**GALLIVAN, WHITE & BOYD, P.A.**

By: *AB Stratton*

A. Johnston Cox, SC Bar # 9081  
Ashley B. Stratton, SC Bar # 74840  
PO Box 7368  
Columbia, SC 29202  
jcox@gwblawfirm.com  
astratton@gwblawfirm.com  
(803) 779-1833 Ofc  
(803) 779-1767 Fax

*Attorneys for Appellant Allstate Fire  
and Casualty Insurance Company*

January 4, 2018

THE SOUTH CAROLINA COURT OF APPEALS

Stephany A. Connelly and James M. Connell, Plaintiffs

v.

The Main Street America Group, Old Dominion Insurance Company, Allstate Fire and Casualty Insurance Company, Debbie Cohn, and Freya Trozona, Defendants

Of whom Allstate Fire and Casualty Insurance Company, The Main Street America Group, and Old Dominion Insurance Company are the Appellants,

And

Stephany A. Connelly and James M. Connelly are the Respondents.

Appellate Case No. 2017-002234

The Honorable Jocelyn Newman  
Richland County  
Trial Court Case No. 2016CP4005885

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
Case Tracking No. 2017-002234

RECEIVED  
JAN 04 2018  
SC Court of Appeals

---

**PROOF OF SERVICE**

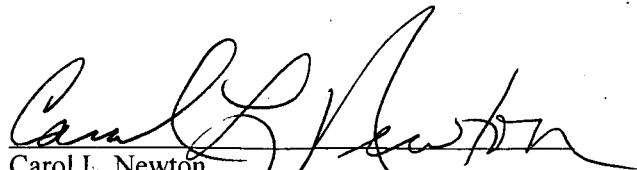
---

I, the undersigned employee of Gallivan, White & Boyd, P.A., do hereby certify that I have caused **Appellant Allstate Fire and Casualty Insurance Company's Motion for Extension of Time to File Initial Brief** to be served via U.S. mail, postage prepaid, *or by other delivery as indicated*, to all parties of record at the address(es) shown below on January 4, 2018.

John D. Kassel, Esquire  
Theile B. McVey, Esquire  
PO Box 1476  
Columbia, SC 29202-1476

Benjamin D. McCoy, Esquire  
Howser, Newman & Besley, LLC  
PO Box 12009  
Columbia, SC 29211

Thomas F. Dougall, Esquire  
Michal Kalwajtys, Esquire  
Dougall & Collins  
1700 Woodcreek Farms Road, Suite 100  
Elgin, SC 29045

  
Carol L. Newton  
Legal Assistant to Ashley B. Stratton

January 4, 2018

**RECEIVED**

JAN 04 2018

SC Court of Appeals

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals  
1015 Sumter Street  
Columbia, SC 29211

Re: *Stephany A. Connelly and James M. Connelly v. The Main Street America Group; Old Dominion Insurance Company; Allstate Fire and Casualty Insurance Company; Debbie Cohn; and Freya Trozona*  
Richland County Case No. 2016-CP-40-5885  
Court of Appeal Case No. 2017-002234  
Allstate Claim No. 0396105223  
GWB File No. 8300-345

Dear Ms. Kitchings:

Please find enclosed for filing an original and six (6) copies of Appellant Allstate Fire and Casualty Insurance Company's Motion for Extension of Time to File Initial Brief regarding the above-referenced matter. Please return a clocked copy to me via our courier.

I am enclosing a check in the amount of \$25.00 to cover the cost of filing. By copy of this letter, I am providing a copy of this request to counsel of record.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Ashley B. Stratton

ABS/cln-  
Enclosures

cc: John D. Kassel, Esquire  
Theile B. McVey, Esquire  
Benjamin D. McCoy, Esquire  
Thomas F. Dougall, Esquire  
Michal Kalwajtys, Esquire



GALLIVAN WHITE BOYD  
1201 Main Street, Suite 1200  
Post Office Box 7368 (29202)  
Columbia, South Carolina 29201

ABS 8300-345

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals  
1015 Sumter Street  
Columbia, SC 29211

**RECEIVED**  
JAN 04 2018  
SC Court of Appeals