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**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

**RECEIVED**

JUL 17 2018

**APPEAL FROM CHARLESTON COUNTY**

**SC Court of Appeals**

**Court of Common Pleas**

**IN CASE NO. 15-CP-10-6684, THE HONORABLE KRISTI LEA HARRINGTON**

**CASE No. 2018-000692**

Zurich American Insurance Company of Illinois,.....Respondent

v.

Palmetto Contract Services, Inc.,.....Appellant

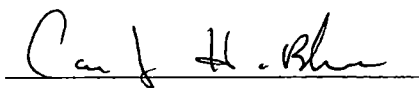
**MOTION FOR ENLARGEMENT OF TIME  
TO FILE RESPONDENT'S INITIAL BRIEF**

Respondent, Zurich American Insurance Company of Illionois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for a fourteen (14) day enlargement of time, from July 18, 2018 to August 1, 2018, to file its Initial Brief. The extension is requested due to counsel's schedule and the additional time needed for Respondent to properly prepare and file its Initial Brief.

For the reason stated above, Respondent respectfully requests that the Court grant this Motion for Enlargement of Time to File Respondent's Initial Brief. Appellant's counsel, William Scott, Esq. has consented in writing to the two-week extension.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted.

A handwritten signature in cursive script, reading "Carolyn H. Blue", is written over a horizontal line.

Carolyn H. Blue (SC Bar # 68506)  
PO Box 30845  
Charleston, SC 29407  
Tel: (843) 225-4445  
Fax: (843) 225-2009  
E-Mail: Carolyn.blue@ymail.com

*Attorney for Respondent*

Dated this 16<sup>th</sup> Day of July 2018

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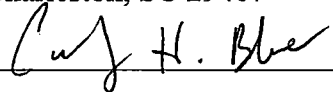
Palmetto Contract Services, Inc.,.....Appellant

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**PROOF OF SERVICE**

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I certify that I have served the **Motion for Enlargement of Time to File Respondent's Initial Brief**, by depositing copy of it in the United States Mail, postage prepaid on July 16, 2018, addressed to William A. Scott, Esquire at 775 St. Andrews Blvd. Charleston, SC 29407



Carolyn H. Blue (SC Bar # 68506)  
PO Box 30845  
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Tel: (843) 225-4445  
Fax: (843) 225-2009  
E-Mail: Carolyn.blue@ymail.com

*Attorney for Respondent*  
Dated this 16<sup>th</sup> Day of July 2018

**LARRY D. COHEN, LLC**

**Attorneys at Law  
Post Office Box 30547  
Charleston, S.C. 29417**

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**Telephone: (843) 225-4445  
Facsimile: (843) 225-2009**

Larry D. Cohen \* ▼  
Debra L. Redman ♦ ▼  
Carolyn H. Blue

\* Member SC, FL, GA & TX  
♦ Member SC & TX Bars  
▼ TX- inactive

July 16, 2018

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

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**JUL 17 2018**

**SC Court of Appeals**

Re: Zurich American Insurance Company of Illinois, Respondent  
v.  
Palmetto Contract Services, Inc., Appellant  
Case No. 18-000692

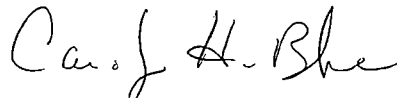
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the Motion for Enlargement of Time to File the Respondent's Initial Brief, with attached proof of service thereof. Our firm has enclosed a check in the amount of \$25 (check number 6866) for the motion fee.

Please file the documents and return a stamped copy in the return addressed stamped envelope.

If you have any questions, please do not hesitate in contacting either Larry Cohen or me. Thank you for your assistance in this matter.

Sincerely,



Carolyn H. Blue

Enclosures  
Counsel of Record: William A. Scott, Esq.

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