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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY

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

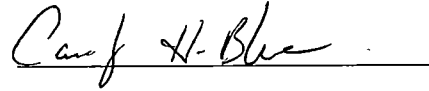
MOTION FOR ENLARGEMENT OF TIME

TO FILE RESPONDENT'S REPLY

Respondent, Zurich American Insurance Company of Illionois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from September 4, 2018 to September 28, 2018, to file its Reply to Appellant's Return to Respondent's Motion to Dismiss. The extension is requested due to counsel's schedule and a letter of protection filed previously by counsel concerning being unavailable from August 29, 2018 through September 5, 2018, September 10 -11 and September 18, 2018 due to vacation and religious holidays and the additional time needed for Respondent to properly prepare and file its Reply.

For the reason stated above, Respondent respectfully requests that the Court grant this Motion for Enlargement of Time to File Respondent's Reply. Appellant's counsel, William Scott, Esq. has consented in writing to the extension until September 28, 2018.

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 28th Day of August 2018

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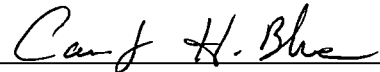
Zurich American Insurance Company of Illinois,.....Respondent

v.

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

PROOF OF SERVICE

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 August 28, 2018, 2018, addressed to William A. Scott, Esquire at 775 St. Andrews Blvd. Charleston, SC 29407



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 28th Day of August 2018

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LARRY D. COHEN, LLC

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

Larry D. Cohen * ▼
Debra L. Redman ♦ ▼

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

August 28, 2018

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

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SC Court of Appeals

Re: Zurich American Insurance Company of Illinois, Respondent
v.
Palmetto Contract Services, Inc., Appellant
Appellate Case: 2018-000692

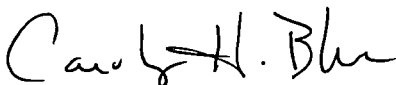
Dear Ms. Kitchings:

Enclosed please find the in the above referenced matter, an original and seven copies of the Respondent's Motion for Enlargement of Time, with attached Certificate of Service and our firm's check for \$25 for the Motion fee.

Please return a stamped copy of the Motion in the enclosed self-addressed stamped envelope along with the receipt for the \$25 Motion fee.

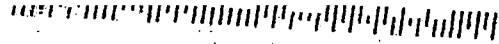
Thank you for your prompt attention to this matter. If you have any questions, please contact Larry Cohen or me in this matter.

Sincerely,



Carolyn H. Blue
Of Counsel

✓



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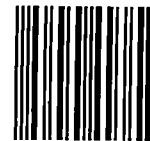
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