

RECEIVED

OCT 15 2018

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

---

CASE NO.: 2018-001679

---

South Carolina Farm Bureau Mutual Insurance Company.....Respondent

vs.

Michael David Harrelson, Devora Harrelson, Kevin Duke  
and Government Employees Insurance Company ..... Defendants

OF WHOM:

Michael David Harrelson and Devora Harrelson are..... Petitioners  
and  
Government Employees Insurance Company is.....Respondent

---

MOTION FOR EXTENSION OF TIME FOR RESPONDENT GOVERNMENT EMPLOYEES  
INSURANCE COMPANY TO FILE RETURN TO PETITION FOR WRIT OF CERTIORARI  
TO THE COURT OF APPEALS

---

Pursuant to Rules 240 and 242(f), SCACR, counsel for Respondent Government  
Employees Insurance Company (“GEICO”) moves the Court for a fifteen-day extension of time  
within which to file its Return to Petition for Writ of Certiorari to the Court of Appeals. Due to  
counsel’s current case load and schedule, counsel respectfully submits that the requested extension

is required to fully and adequately research and brief the issues raised in the Petition, making it due on or before October 26, 2018.

GEICO has not interposed this motion solely for delay, and it will not prejudice Petitioner. GEICO further requests that the Court hold any current deadlines in abeyance pending its ruling.

Respectfully submitted,

  
THE WARD LAW FIRM, P.A.  
Attorneys for Defendant Government  
Employees Insurance Company  
John E. Rogers, II (SC Bar # 72779)  
Ginger D. Goforth (SC Bar #6904)  
P.O. Box 5663  
Spartanburg, SC 29304  
864-591-2366  
864-585-3090 Fax  
Email: [jrogers@wardfirm.com](mailto:jrogers@wardfirm.com)  
[ggoforth@wardfirm.com](mailto:ggoforth@wardfirm.com)

October 11, 2018

RECEIVED

OCT 15 2018

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

---

CASE NO.: 2018-001679

---

South Carolina Farm Bureau Mutual Insurance Company.....Respondent

vs.

Michael David Harrelson, Devora Harrelson, Kevin Duke  
and Government Employees Insurance Company ..... Defendants

OF WHOM:

Michael David Harrelson and Devora Harrelson are..... Petitioners

and

Government Employees Insurance Company is .....Respondent

---

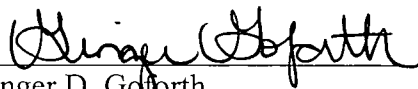
**PROOF OF SERVICE**

---

The undersigned hereby certifies that the Respondent, Government Employees Insurance Company's Motion for Extension of Time to File Return to Petition for Writ of Certiorari to the Court of Appeals was served upon all parties of record on October 11, 2018 by depositing copies of the same via process service and/or United States mail, postage affixed, to the following address:

J. Dwight Hudson, Esquire  
Hudson Law Offices  
PO Box 70218  
Myrtle Beach, SC 29572  
[HUDSONLAW@HUDSONLAWOFFICE.COM](mailto:HUDSONLAW@HUDSONLAWOFFICE.COM)

Gene N. Connell, Jr., Esquire  
Kelaher, Connell & Connor, PC  
PO Drawer 14547  
Surfside Beach, SC 29587  
[GCONNELL@CLASSACTLAW.NET](mailto:GCONNELL@CLASSACTLAW.NET)

  
Ginger D. Gorth