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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Letitia Verdin, Circuit Court Judge

RECEIVED

NOV 07 2018

SC Court of Appeals

Branden Rector.....Appellant,

v.

Allstate Insurance Company,
Allstate Fire and Casualty Insurance Company,
John Doe, Progressive Casualty Insurance Company,
Progressive Direct Insurance Company, Laura Masel,
and South Carolina Director of Insurance Ray Farmer.....Respondents.

Appellate Case No. 2018-001846

MOTION FOR EXTENSION OF TIME

On October 4, 2018, the Circuit Court issued a Form 4, and the appellant filed a notice of appeal. On October 16, 2018, one of the respondents, Progressive Direct Insurance Company, filed a proposed order with the Circuit Court. On October 18, 2018, the Circuit Court issued another Form 4 as to the proposed order. On October 19, 2018, the appellant filed a motion to reconsider the Circuit Court's October 18, 2018, order. The Circuit Court has not ruled on the second motion to reconsider. In an abundance of caution, the appellant requests that the Appellate Court grant an extension of time for the appellant to order the transcript of the hearing in Circuit Court and the time to file the initial brief.

The time to request the hearing transcript runs from the time the appellant files a notice of appeal, but the appellant may have to file another notice of appeal since the motion to reconsider the Circuit Court's second Form 4 and Order has not been ruled on. Additionally, this appeal arises from an integrally related underlying action, which is still pending. Mediation was scheduled in that case for November 13, 2018, but due to defense counsel being on trial rosters for that date, the mediation had to be postponed. The appellant anticipates that if that underlying

action is resolved, the defendants in that action may require withdrawal of this appeal. The appellant believes that time to order the transcript will start to run from the time the second notice of appeal is filed after the second motion to reconsider is ruled on, but in an abundance of caution, the appellant requests that the Appellate Court grant a 60 day extension of time to order the transcript and file the appellant's initial brief to protect the appeal. In the meantime, the appellant will go ahead and order the transcript in the interest of narrowing as many issues as possible and moving the appeal forward when the Circuit Court has ruled on the second motion to reconsider.

November 5, 2018

s/ Joshua T. Hawkins

Joshua T. Hawkins, S.C. Bar #78470
Helena L. Jedziniak, S.C. Bar #100825
Hawkins & Jedziniak, LLC
1225 South Church Street
Greenville, South Carolina 29605
(864) 275-8142 (telephone)
(864) 752-0911 (facsimile)
Attorneys for Appellant

Mike Coulter
Clarkson, Walsh, & Coulter, P.A.
P.O. Box 6728
Greenville, South Carolina 29606
(864) 232-4400 (telephone)
Attorney for Respondent John Doe

J.R. Murphy
Murphy & Grantland, P.A.
P.O. Box 6648
Columbia, South Carolina 29260
(803) 782-4100 (telephone)
**Attorney for Respondents Laura Masel, Progressive Direct Insurance Company, and
Progressive Casualty Insurance Company**

Melissa Biggers Manning
1201 Main Street, Suite 1000
Columbia, South Carolina 29201
(803) 737-6204 (telephone)

Attorney for Respondent South Carolina Director of Insurance Ray Farmer

A. Johnston Cox
Gallivan White & Boyd
1201 Main Street, Suite 1200
Columbia, South Carolina 29201
(803)779-1833 (telephone)

**Attorneys for Respondents Allstate Insurance Company and
Allstate Fire and Casualty Insurance Company**

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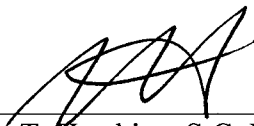
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Appellate Case No. 2018-001846

PROOF OF SERVICE

I certify that I have mailed for filing the original and six copies of the appellant's motion for extension of time to the South Carolina Court of Appeals on the date indicated below. I further certify that I have sent a copy to the respondent's attorney and all counsel of record, as indicated in my cover letter accompanying the motion.

November 5, 2018



Joshua T. Hawkins, S.C. Bar #78470
The J.T. Hawkins Law Firm, LLC
1225 South Church Street
Greenville, South Carolina 29605
Tel: (864) 275-8142
Attorney for Appellant

Hawkins & Jedziniak, LLC

1225 South Church Street
Greenville, South Carolina 29605
Telephone: (864) 275-8142
Facsimile: (864) 752-0911
josh@hjlsc.com

November 5, 2018

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

Re: *Branden Rector, Appellant v. Allstate, et al., Respondents*
Appellate Case No. 2018-001846

Dear Ms. Kitchings:

Enclosed, please find:

- 1) The original and six copies of the appellant's motion for extension of time;
- 2) Our proof of service reflecting service on all parties; and
- 3) A check for \$50.00 for the filing fee.

If the Court needs anything further from us, please let us know.

Sincerely,



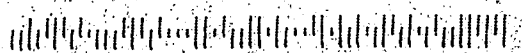
Joshua T. Hawkins
Attorney for Appellant

Enclosures

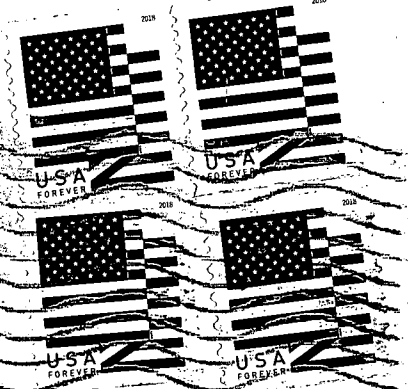
Copies:

Mike Coulter
Clarkson, Walsh, & Coulter, P.A.
P.O. Box 6728
Greenville, South Carolina 29606

H & J, LLC
1225 S. Church
Greenville, SC 29605



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