

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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DEC 11 2018

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 INTIAL BRIEF

Respondent, Zurich American Insurance Company of Illionois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from December 13, 2018 to January 30, 2019 to file its Initial Brief. The extension is requested due to Counsel Carolyn Blue's father dying on December 5, 2018 and her being unexpectedly away dealing with family matters and a letter of protection filed previously in Charleston and Beaufort Counties by Co-Counsel Larry Cohen who is unavailable due to vacation for periods in December and January and the additional time needed for Respondent to properly prepare and file its Initial Brief.

For the reasons 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 extension until January 30, 2019

Respectfully submitted,

 Carolyn H. Blue by POC

Carolyn H. Blue (SC Bar # 68506)

PO Box 30845

Charleston, SC 29417

Tel: (843) 225-4445

Fax: (843) 225-2009

E-Mail: Carolyn.blue@ymail.com

Attorney for Respondent

Dated this 7th Day of December 2018

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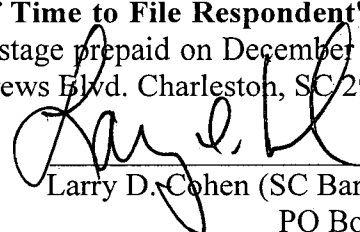
Zurich American Insurance Company of Illinois,.....Respondent

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 December 7, 2018, 2018, addressed to William A. Scott, Esquire at 775 St. Andrews Blvd. Charleston, SC 29407


Larry D. Cohen (SC Bar # 6264)
PO Box 30547
Charleston, SC 29417
Tel: (843) 225-4445
Fax: (843) 225-2009
E-Mail: ldcohen@ldcohenlaw.com

Attorney for Respondent
Dated this 7th Day of December 2018

LARRY D. COHEN, LLC

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

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

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

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

December 7, 2018

Via CMRRR # 7015 3010 0001 9615 8195

The Honorable Jenny Abbott Kitchens
Clerk of Court
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 an original and seven copies of the Respondent's Motion for Enlargement of Time, with our Certificate of Service and our law firm's Check No. 6887, in the amount for \$25.00, for the Motion fee.

Please return a file-stamped copy of our Motion in the enclosed self-addressed stamped envelope along with the receipt for the \$25.00 Motion fee. Our client will not reimburse us unless we have a receipt for the Motion fee.

Thank you for your prompt attention to this matter. If you have any questions, please contact Larry Cohen in this matter as I am away due to the death of my father which is one of the reasons, we are requesting the enlargement of time.

Sincerely,

Carolyn H. Blue
By ddc

Carolyn H. Blue
Of Counsel

✓



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Larry D. Cohen
Larry D. Cohen, LLC
Attorneys at Law
Post Office Box 30547
Charleston, S.C. 29417

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SC Court of Appeals

The Honorable Jenny Abbott Kitchens
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