

December 21, 2018

VIA FACSIMILE & US MAIL

The Honorable Daniel E. Shearouse
Supreme Court Building
1231 Gervais Street
Columbia, South Carolina 29201
Fax to: (803) 734-1499

RECEIVED

DEC 27 2018

**Re: Mt. Hawley Insurance Company v. Contravest, Inc.
Appellate Case No. 2018-001170
Fourth Circuit Court of Appeals Case No. 18-1401**

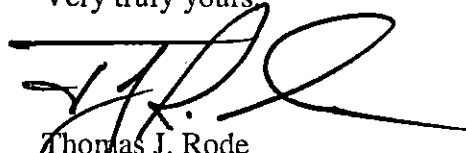
S.C. SUPREME COURT

Dear Mr. Shearouse:

Please find enclosed an original and seven (7) copies of Respondents' Motion for Enlargement of Time to File its Brief together with the filing fee in the amount of Fifty Dollars (\$50.00). Thank you in advance for your assistance with this matter. Should you have any questions or concerns, please do not hesitate to contact us.

With best regards, I am

Very truly yours,


Thomas J. Rode
thomas@tktlawyers.com

TJR/
Enc: Check No. 15608
Cc: All counsel of Record

**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

ON CERTIFICATION FROM THE FOURTH CIRCUIT COURT OF APPEALS
Upon *Writ of Mandamus* being held in Abeyance to
The United States District Court
for
The District of South Carolina

The Honorable David C. Norton, District Court Judge

Appellate Case No. 2018-001170
Fourth Circuit Court of Appeals Case No. 18-1401
District Court Case No. 9:15-cv-00304-DNC

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S.C. SUPREME COURT

In re: MT. HAWLEY INSURANCE COMPANY.....Petitioner,

in which

CONTRAVEST, INC., CONTRAVEST CONSTRUCTION COMPANY
AND PLANTATION POINT HORIZONTAL PROPERTY REGIME OWNERS
ASSOCIATION, INC., as assignees are.....Respondents.

**RESPONDENTS' MOTION FOR ENLARGEMENT OF TIME
TO FILE BRIEF**

THURMOND KIRCHNER & TIMBES, P.A.
Jesse A. Kirchner, SC Bar No. 70479
Michael A. Timbes, SC Bar No. 69730
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Attorneys for Respondent

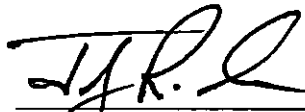
COME NOW the above-named Respondents pursuant to Rules 240 and 263(b), SCACR, and moving this Honorable Court for an Order extending the time for filing and serving Respondents' Brief which is currently due by December 27, 2018.

Due to unforeseen scheduling issues compounded by planned travel over the upcoming Christmas and New Year holidays, Respondents' counsel herein request a thirty-day extension, which falling on a weekend, would have Respondents' Brief due on January 28, 2019.

Therefore, Respondents respectfully request this Honorable Court issue an Order extending Respondents' time for filing and serving its brief until **Monday, January 28, 2019**.

Respectfully submitted,

THURMOND KIRCHNER & TIMBES, P.A.



Jesse A. Kirchner, SC Bar No. 70479

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Attorneys for Respondents

December 21, 2018
Charleston, South Carolina.

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In the Supreme Court**

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S.C. SUPREME COURT

In re: MT. HAWLEY INSURANCE COMPANYPetitioner,

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POINT HORIZONTAL PROPERTY REGIME OWNERS ASSOCIATION, INC.,

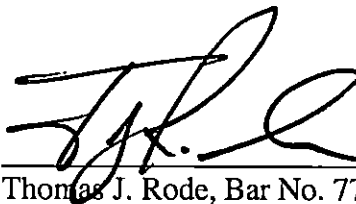
as assignees areRespondents

PROOF OF SERVICE

I, Thomas J. Rode, attorney for the Respondents, do hereby certify that I have on this date,
served a true and correct copy of the Respondent's Motion for Enlargement of Time for Filing
Brief via US Mail to the following counselors of record:

COUNSEL FOR PETITIONER
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This 21st day of December, 2018
Charleston, South Carolina

THURMOND KIRCHNER



& TIMBES, P.A.

ATTORNEYS AT LAW

15 Middle Atlantic Wharf
Charleston, South Carolina 29401

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