

**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

**RECEIVED**

**APPEAL FROM CHARLESTON COUNTY**

**JAN 25 2019**

**Court of Common Pleas**

**SC Court of Appeals**

**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

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**MOTION FOR ENLARGEMENT OF TIME**

**TO FILE RESPONDENT'S REPLY**

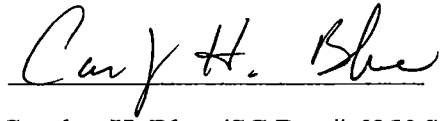
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Respondent, Zurich American Insurance Company of Illionois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from January 31, 2019 to February 15, 2019, to file its Reply to Appellant's Answer to Respondent's Motion to Dismiss.

The extension is requested due to counsel's schedule and the recent death of respondent counsel's father 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 February 15, 2019.

Respectfully submitted.

A handwritten signature in cursive script that reads "Carolyn H. Blue". The signature is written in black ink and is positioned above 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 24th Day of January 2019

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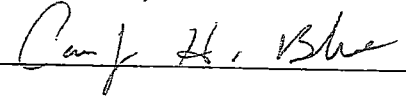
Palmetto Contract Services, Inc.,.....Appellant

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**PROOF OF SERVICE**

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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 January 24, 2019, 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 24<sup>th</sup> Day of January 2019

**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

January 24, 2019

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

88878  
**RECEIVED**  
JAN 25 2019  
SC Court of Appeals

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

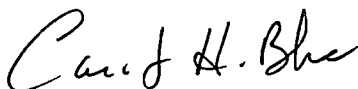
Dear Ms. Kitchens:

Please find enclosed 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 \$50 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 \$50 Motion fee.

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

Sincerely,



Carolyn H. Blue  
Of Counsel