

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

IN CASE NO. 15-CP-10-6684, THE HONORABLE KRISTI LEA HARRINGTON

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Case No. 2018-000692

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

v.

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

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**MOTION FOR ENLARGEMENT OF TIME  
TO FILE APPELLANT’S REPLY BRIEF  
AND OBJECTIONS TO RESPONDENT’S DESIGNATION OF MATTERS**

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Appellant, Palmetto Contract Services, Inc. (hereinafter, “Appellant”), by and through the undersigned counsel, hereby moves for a fourteen (14) day enlargement of time, from March 1, 2019 to March 15, 2019, to file its Reply Brief and Objections to Respondent’s Designation of Matters. The extension is requested due to the counsel’s schedule and the additional time needed for Appellant to properly prepare and file its Reply Brief and Objections to Respondent’s Designation of Matters.

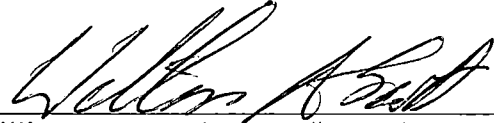
For the reasons stated above, Appellant respectfully requests that the Court grant this Motion for Enlargement of Time to File Appellant’s Reply Brief and Objections to Respondent’s Designation of Matters.

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SC Court of Appeals

Respondent's counsel consent to the fourteen (14) day extension.

Respectfully submitted.

PEDERSEN & SCOTT, P.C.

A handwritten signature in black ink, appearing to read "William A. Scott", written over a horizontal line.

William A. Scott (SC Bar #15148)

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Charleston, SC 29407

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*Attorney for Appellant*

Dated this 25th day of February, 2019

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Case No. 2018-000692

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

v.

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**PROOF OF SERVICE**

I certify that I have served the **Motion for Enlargement of Time to File Appellant's Reply and Objections to Respondent's Designation of Matters**, by depositing a copy of it in the United States Mail, postage prepaid, on February 20, 2019, addressed to Larry D. Cohen, Esq., Larry D. Cohen, LLC, P.O. Box 30547, Charleston, SC 29417 and Carolyn H. Blue, Esq., P.O. Box 30845, Charleston, SC 29417.

PEDERSEN & SCOTT, P.C.



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*Attorney for Appellant*

Dated this 25th day of February, 2019

**PEDERSEN & SCOTT, P.C.**  
ATTORNEYS AT LAW

P 843-556-5656  
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February 25, 2019

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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: **Zurich American Insurance Company of Illinois, Respondent**  
**v. Palmetto Contract Services, Inc., Appellant**  
**Appellate Case No.: 2018-000692/Case No. 15-CP-10-6684**

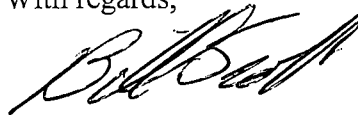
Dear Ms. Kitchings:

Enclosed with respect to the above-referenced matter, please find an original and seven (7) copies of the Motion for Enlargement of Time to File Appellant's Reply Brief and Objections to Respondent's Designation of Matters, with attached proof of service thereof. Also enclosed is check in the amount of \$25.00 in payment of the motion fee.

Kindly file the documents and return a stamped copy in the return addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

With regards,



William A. Scott

WAS/teb  
Enclosures  
Counsel of Record (w/enc.):  
Larry Cohen, Esq.  
Carolyn H. Blue, Esq.

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