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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the 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

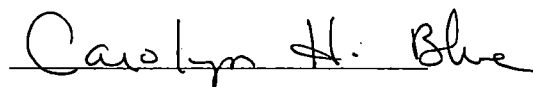
MOTION FOR ENLARGEMENT OF TIME

TO FILE RETURN

Respondent, Zurich American Insurance Company of Illionois (hereinafter, Respondent), by and through the undersigned counsel hereby moves for an enlargement of time, from March 29, 2019 to April 12, 2019, to file its Return to Palmetto Contract Services Motion to Exclude. The extension is requested due to counsel's schedule and the additional time needed for Respondent to properly prepare and file its Return.

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 April 12, 2019.

Respectfully submitted.



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 23rd Day of March 2019

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PROOF OF SERVICE

I certify that I have served the **Motion for Enlargement of Time to File Return**, by depositing copy of it in the United States Mail, postage prepaid on March 23, 2019, addressed to William A. Scott, Esquire at 775 St. Andrews Blvd. Charleston, SC 29407

Carolyn H. Blue

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 23rd Day of March 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

March 23, 2019

The Honorable Jenny Abbott Kitchings
Clerk,
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:

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 (Check Number 6976) 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

cc: William Scott, Esq.

V

Cohen Law Firm
PO Box 30547
Charleston, SC 29417



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Clerk of Court
S.C. Court of Appeals
PO Box 11629
Columbia, SC

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