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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHESTER COUNTY  
Court of Common Pleas

Honorable John C. Hayes III, Circuit Court Judge  
Honorable Brian Gibbons, Circuit Court Judge

RECEIVED  
APR 18 2019  
SC Court of Appeals

Appellate Case No: 2019-002115

Heidi Gersten, Ivanka Ayoub, Daniel Hubbard.....Plaintiffs,

Heidi Gersten, Ivanka Ayoub.....Appellants.

v.

Kevin Carter, Richard Davis, Joseph Tirbovich, Nationwide Mutual Insurance  
Company , Interinsurance Exchange of the Automobile Club, John Ammendola,  
Trustgard Insurance Co., Blackwell, SC Department of Public Safety, Chevrolet,  
GMC, Unknown John Does, .....Respondents

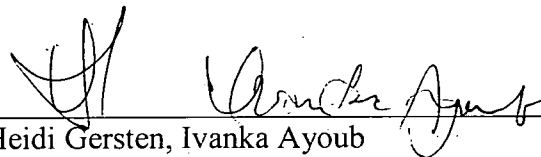
APPELLANTS' NOTICE OF MOTION AND MOTION FOR  
EXTENSION OF TIME TO SERVE AND FILE AMENDED RETURN  
TO RESPONDENTS CARTER AND DAVIS' MOTION TO DISMISS  
APPEAL AND AFFIDAVIT OF HEIDI GERSTEN

Heidi Gersten, Ivanka Ayoub  
1438 W. Lantana Rd., #330  
Lantana, FL 33462  
(323) 245-6142  
(561) 756-9820 FAX  
[hanginhangout@gmail.com](mailto:hanginhangout@gmail.com)  
Appellants

The Appellants, Heidi Gersten, Ivanka Ayoub ('Appellants') move this Court for an extension of time to serve and file an amended return of the Respondents Carter and Davis' motion to dismiss appeal pursuant to SCACR 263(b) on the grounds of good cause shown as evidenced by the attached Affidavit of Heidi Gersten. Previous extensions were requested on March 7, 2019 March 18, 2019, March 25, 2019, and April 4, 2019. In light of the good cause shown, an additional ten (10) days is required to accurately and sufficiently submit an amended return.

The Appellants' argument will be more fully addressed in the attached Memorandum of Points and Authorities in Support.

Respectfully submitted this 15<sup>th</sup> day of April 2019,



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Heidi Gersten, Ivanka Ayoub  
Appellants  
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[hanginhangout@gmail.com](mailto:hanginhangout@gmail.com)

Boca Raton, Florida  
April 15, 2019

CERTIFICATE OF SERVICE  
(Appellate Case No: 2019-002115)

The undersigned, over 18 years of age and not a party to the said action, hereby certifies that (s)he has served the following named individuals with a copy of the foregoing: : Appellate Case No: 2019-002115 APPELLANTS' NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' AMENDED RETURN OF RESPONDENT CARTER AND DAVIS' MOTION TO DISMISS ALONG WITH A MORE DETAILED RESPONSE TO THIS COURT'S LETTER DATED FEBRUARY 15, 2019 along with letter to the Court dated April 15, 2019, and AFFIDAVIT OF APPELLANT HEIDI GERSTEN and, MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF APPELLANTS' MOTION FOR EXTENSION OF TIME, by mailing a copy of same to them in the U. S. Post Office mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

Wesley Brian Sawyer, Esquire  
Murpy & Grantland, P.A.  
4406 Forest Drive #B  
Columbia, SC 29206  
(Attorney for Kevin Carter and Richard Davis)

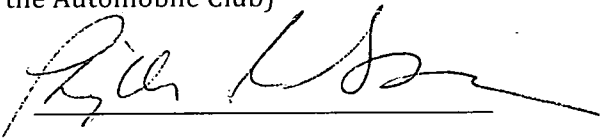
David R. Sligh  
P.O. Box 2116  
Myrtle Beach, SC 29578  
(Attorney for Nationwide Mutual Ins. Co)

Peter H. Dworjanyn, Esquire and  
Michael R. Burchstead, Esquire  
Collins & Lacy, PC  
1330 Lady Street, 6<sup>th</sup> Floor (29201)  
Post Office Box 12487  
Columbia, SC 29211  
(Attorneys for Trustguard Insurance Company)

William H. Davidson II, Esquire  
Davidson & Lindemann, PA  
P.O. Box 8568  
Columbia, SC 29202  
(Attorney for SC Dept. of Public Safety  
and Trooper Herbert Blackwell)

Reynolds Williams  
P.O. Box 1909  
Florence, SC 29503-1909  
(Attorney for Defendant Interinsurance Exchange of the Automobile Club)

Alexander S. Gogsette  
P.O. Box 5478  
Florence, SC 29502  
(Attorney for Joseph Tirbovich)

By: 

Boca Raton, Florida  
April 15, 2019

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APR 18 2019

SC Court of Appeals

April 15, 2019  
1438 W. Lantana Rd., #330  
Lantana, FL 33462

Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
(843)662-3258 Fax (843)662-1342

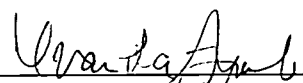
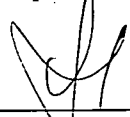
RE: Appellate Case No.: 2018-002115

Dear Ms. Kitchings:

Good day to you.

Please find an enclosed U.S. postal money order in the amount of \$50.00 for the enclosed original NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' AMENDED RETURN OF RESPONDENT CARTER AND DAVIS' MOTION TO DISMISS along with a more detailed response to this Court's letter dated February 14, along with 7 copies. Please file the original and return a file-stamped copy in the pre-paid postage envelope provided. Thank you for your time regarding this matter.

Respectfully submitted,



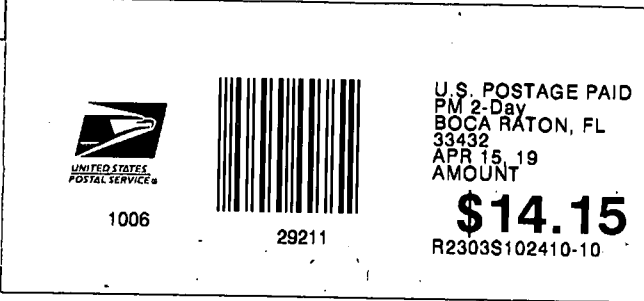
Appellants Heidi Gersten, Ivanka Ayoub  
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HG/Enclosures

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This product is for use with Priority Mail.  
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HEIDI STEW, IVANKA AYARB  
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LANTANA, FL 33462



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SC Court of Appeals

Honorable Jenny Abbott Kitchings  
Clerk of Court

SC Court of Appeals

PO Box 11629

Columbia, SC 29211