

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Robin B. Stilwell, Circuit Court Judge

RECEIVED

AUG 22 2019

SC Court of Appeals

Appellate Case No. 2019-000020
Case No. 2018-CP-23-2580

South Carolina Property and Casualty
Insurance Guaranty Association,..... Respondent,

v.

Second Injury Fund Operations of the South Carolina Insurance
Reserve Fund f/k/a South Carolina Second Injury Fund, Appellant,

In Re:

Michael Quarles..... Employee/Claimant,

v.

Cryovac Sealed Air Corporation, Employer,

and

Lumbermens Mutual Casualty Company in Liquidation/South Carolina
Property and Casualty Insurance Guaranty Association, Carrier/Defendant.

**MOTION FOR EXTENSION TO
FILE INITIAL REPLY BRIEF OF APPELLANT**

The Appellant Second Injury Fund Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second Injury Fund respectfully moves this Court for an additional extension of time of five days until August 27, 2019, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant's motion is based on the following grounds:

1. The Appellant's Initial Reply Brief is currently due to be filed and served on August 22, 2019.

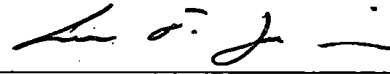
2. The undersigned counsel for the Appellant requires this additional time to complete the preparation and drafting of the Appellant's Initial Reply Brief because of other obligations and deadlines, including a federal court dispositive motion due. The undersigned counsel has plans to be out-of-state for family reasons. Additionally, co-counsel, Robert M. Cook, is out of the office in mediation training and unavailable to consult on the content of the reply brief.

3. Counsel for the Respondent South Carolina Property and Casualty Insurance Guaranty Association has been consulted and has consented to the requested extension through August 27, 2019. (See attached email).

WHEREFORE, the Appellant Second Injury Fund Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second Injury Fund respectfully requests that it be allowed until August 27, 2019, by which to file and

serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN, DAVIS & HUGHES, P.A.

BY: 

ANDREW F. LINDEMANN #13030
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-and-

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*Counsel for Appellant Second Injury Fund
Operations of the South Carolina Insurance
Reserve Fund f/k/a South Carolina Second
Injury Fund*

August 22, 2019

From: Hubert Wood <hubie@woodgroupllc.com>
Sent: Thursday, August 22, 2019 9:18 AM
To: Andrew Lindemann
Cc: Robert Cook; Jennifer Baker
Subject: Re: Guaranty Fund v. SIF

Of course- thanks,
HW

Sent from my iPhone

On Aug 22, 2019, at 9:17 AM, Andrew Lindemann <Andrew@LDH-Law.com> wrote:

Hubie:

I have a favor to ask. Our reply brief is due today. I just learned that Rob Cook is out of pocket all day because of mediation training, and I am trying to get out of town this afternoon to visit my daughter in Alabama for her birthday. Would you kindly consent to an extension of an additional 5 days for us to file our Initial Reply Brief in this appeal. I need to get that motion filed this morning. Thanks.

Andrew

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AUG 22 2019

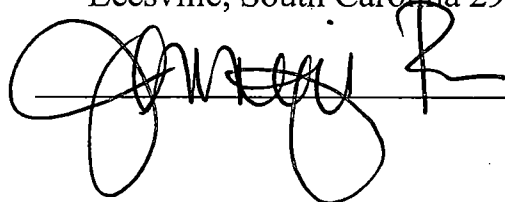
SC Court of Appeals

CERTIFICATE OF SERVICE

The undersigned employee of Lindemann, Davis & Hughes, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension of Time to File Initial Reply Brief of Appellant** was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelope this the 22nd day of August 2019:

J. Hubert Wood, III, Esquire
Wood Law Group, LLC
Post Office Box 20550
Charleston, South Carolina 29413

Robert M. Cook, II, Esquire
The Robert Cook Law Firm, LLC
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Leesville, South Carolina 29070





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August 22, 2019

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Certified Mediator

Of Counsel

STEVEN R. SPREEUWERS
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AUG 22 2019

SC Court of Appeals

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: South Carolina Property and Casualty Insurance Guaranty Fund v. Second Injury Fund
Operations of the South Carolina Insurance Reserve Fund f/k/a South Carolina Second
Injury Fund
Civil Action Number: 2018-CP-23-2580
Our File Number: 104.10063

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension of Time to File Initial Reply Brief of Appellant** in the above referenced matter. Please file the original and return a clocked-in copy to me by way of my assistant. I have not enclosed a filing fee because the Appellant is an entity of the State of South Carolina. By copy of this letter, I am serving copies on all counsel of record.

If you have any questions, please advise.

Sincerely,

LINDEMANN, DAVIS & HUGHES, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

The Honorable Jenny Abbott Kitchings
August 22, 2019
Page Two

cc: (w/ Enclosure)

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