

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

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

C.A. No: 2018-002115

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

v.

Heidi Gersten, Ivanka Ayoub,.....Petitioners.

MOTION FOR EXTENSION OF TIME TO FILE AND SERVE
PETITIONERS' PETITION FOR A WRIT OF CERTIORARI
AND APPENDIX

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

August 29, 2019

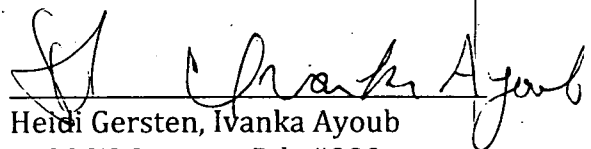
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The Petitioners, Heidi Gersten, Ivanka Ayoub move this court for an extension of time to serve and file a Petition for Writ of Certiorari and accompanying Appendix.

The Petition for Writ of Certiorari and Appendix is due on August 29, 2019 in said case number to be served and filed however due to Petitioner Gersten's extreme hardships suffered from being paralyzed as a result of the controversy in action, an extension of no more than twenty (20) days is requested and is necessary to file and serve the petition and appendix. By the undersigned's calculations, this would extend the deadline for filing and serving the petition and accompanying appendix to September 18, 2019, with a grant.

This is not made to cause unnecessary delay. This is made in an attempt to follow the rules. This Court's Order No: 2014-07-16-01 permits this extension, as well as SCACR 263(b), Title II of the American Disabilities Act and Equitable Tolling.

Respectfully submitted,



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PROOF OF SERVICE

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This is to certify that this day, the undersigned, over 18 years of age and not a party to the said action has served the following named individuals, counsel for the Respondents, in the foregoing matter, the foregoing Petitioner's Motion for Extension of Time to File and Serve the Petitioner's Petition for Writ of Certiorari and accompanying Appendix by depositing (mailing) a copy of same to them in the United States Post Office mail, with sufficient postage affixed thereto (thereon) to ensure delivery and return address clearly marked on the date indicated below, addressed as follows:

Wesley Brian Sawyer, Esquire
Murphy & Grantland, P.A.
4406-B Forest Drive
Columbia SC 29206
Attorney for Respondents Kevin Carter & Richard Davis

David R. Sligh
P.O. Box 2116

Myrtle Beach, SC 29578
Attorney for Respondent Nationwide Mutual Insurance Company


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

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

Peter H. Dworjany, Esquire and
Michael R. Burchstead, Esquire
Collins & Lacy, PC
P.O. Box 12487
Columbia, SC 29211
Attorney for Respondents Trustgard & Ammendola

William H. Davidson II, Esquire
Davidson & Lindemann, PA
P.O. Box 8568
Columbia, SC 29202
Attorneys for Respondents Department of Public Safety & Trooper Herbert
Blackwell

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201


Phyllis Garcia
102 N.E. 2nd Ave.
Boca Raton, FL 33432
(561) 393-3231

August 29, 2019

August 29, 2019
1438 W. Lantana Rd. #330
Lantana, FL 33462
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The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate St.
Columbia, SC 29201

Re: Heidi Gersten, Ivanka Ayoub v. Kevin Carter, Richard Davis, Joseph Tirbovich,
Nationwide Mutual Insurance Co., Interinsurance Exchange of the Automobile Club,
Trustgard, John Ammendola, Blackwell, SC Department of Public Safety, Unknown
John Does

Appellate Case No: 2018-002115

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Dear Ms. Kitchings or To Whom It May Concern:

Good day to you!

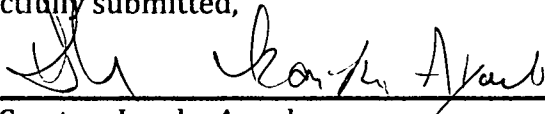
Enclosed for filing, please find an original and seven (7) copies of Appellants'/Petitioners' Motion for Extension of Time to File and Serve Petition for Writ of Certiorari along with accompanying Appendix in the above-referenced matter together with Proof of Service of same. Please return clocked or file-stamped copies in the enclosed self-addressed prepaid stamped envelope.

By copy of this letter, a copy of this motion is served on all counsel of record as well as the Clerk of the Court of Appeals.

Please call the above number if you have any questions.

Thank you for your time and assistance regarding this matter.

Respectfully submitted,



Heidi Gersten, Ivanka Ayoub
Appellants/Petitioners

HG/Enclosures

August 29, 2019
1438 W. Lantana Rd. #330
Lantana, FL 33462
(323) 245-6142
hanginhangout@gmail.com

The Honorable Daniel Shearouse
Clerk of Court, South Carolina Supreme Court
Supreme Court Building
1231 Gervais Street
Columbia, SC 29201

Re: Heidi Gersten, Ivanka Ayoub v. Kevin Carter, Richard Davis, Joseph Tirbovich,
Nationwide Mutual Insurance Co., Interinsurance Exchange of the Automobile Club,
Trustgard, John Ammendola, Blackwell, SC Department of Public Safety, Unknown
John Does

Appellate Case No: 2018-002115

Dear Mr. Shearouse or To Whom It May Concern:

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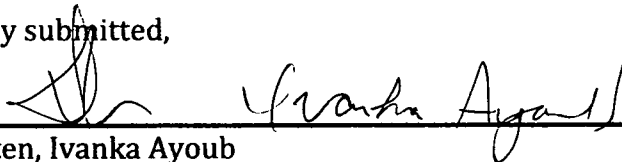
Per phone conversation with Shawn of the Clerk of Court, enclosed for filing, please find an original and seven (7) copies of Appellants'/Petitioners' Motion for Extension of Time to File and Serve Petition for Writ of Certiorari along with accompanying Appendix in the above-referenced matter together with Proof of Service of same. Also enclosed is a United States Postal Money Order in the amount of \$50.00 for the filing fee. Please return clocked or file-stamped copies in the enclosed self-addressed prepaid stamped envelope.

By copy of this letter, a copy of this motion is served on all counsel of record as well as the Clerk of the Court of Appeals.

Please call the above number if you have any questions.

Thank you for your time and assistance regarding this matter.

Respectfully submitted,

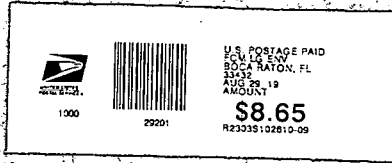
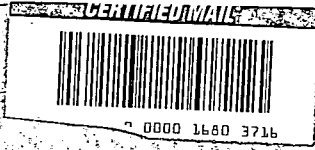


Heidi Gersten, Ivanka Ayoub
Appellants/Petitioners

Enclosures

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SC Court of Appeals

Heidi Gerster, Ivanka
1438 W. Louisiana Rd.
LOUISIANA, LA 70622



RETURN RECEIPT
REQUESTED

THE Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1220 Senate St.
Columbia, SC

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