



FINKLEA LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW

Gary I. Finklea
Charlie J. Blake, Jr.
J. Gregory Hendrick
Patrick B. Ford
J. O'Neill Edwards
Susan C. McGill
B. Hicks Harwell, Jr.
(1933-2012)

October 18, 2019

RECEIVED

OCT 21 2019

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
P.O. Box 11330
Columbia, SC 29211

Re: Teresa Bennett Yates vs. Metropolitan Life Insurance Company and Jane Yates
Case No.: 4:19-CV-00372-MGL / Appellate Case No.: 2019-001264

Dear Mr. Shearouse:

Plaintiff respectfully requests a 30-day extension of time to serve the Brief upon the Defendants in the above matter. The Plaintiff's Brief is now due on October 23, 2019. The grounds for this request are Counsel for Plaintiff's other obligations and filing deadlines in other cases, and this is Plaintiff's first request for an extension of time regarding the Brief. Enclosed please find a copy of correspondence from opposing counsel consenting to this request. By copy of this letter, I am serving opposing counsel.

With kindest regards, I am

Very truly yours,

PATRICK FORD
Finklea Law Firm
Attorney for Plaintiff

PBF/cca
Enclosures

cc: Teresa Bennett Yates
D. Malloy McEachin, Jr., Esquire, McEachin & McEachin, P.A.
J. D. Quattlebaum, Haynsworth Sinkler Boyd, P.A.

Patrick Ford

From: Quattlebaum, Derrick <dquattlebaum@hsblawfirm.com>
Sent: Thursday, October 17, 2019 11:34 AM
To: Patrick Ford; Clark Anderson
Cc: Malloy McEachin
Subject: RE: Yates v. MetLife et al.

I have no objection.

HAYNSWORTH SINKLER BOYD

J. Derrick Quattlebaum | Attorney | General Counsel
Direct 864.240.3249 | dquattlebaum@hsblawfirm.com

Haynsworth Sinkler Boyd, P.A.
ONE North Main, 2nd Floor | Greenville, SC 29601
Main 864.240.3200 | Mobile 864.414.4092 | Fax 864.240.3300

Web | Bio | vCard | Map | Linked In | Blog

From: Patrick Ford <pford@finklealaw.com>
Sent: Thursday, October 17, 2019 11:32 AM
To: Quattlebaum, Derrick <dquattlebaum@hsblawfirm.com>; Clark Anderson <canderson@finklealaw.com>
Cc: Malloy McEachin <malloy@mceachinlawfirm.com>
Subject: RE: Yates v. MetLife et al.

Derrick,

I have performed most of the research for the brief. It is my understanding as Plaintiff our brief is due first. I have a jury trial starting next week, which I thought we were going to be able to resolve. Unfortunately, it has not been resolved and I will need to move forward with it. I am going to file a motion with the Court for additional time pursuant to Rule 262(b). I was wondering if I can let the Court know that you consent to the extension.

I have not done a lot of appellate work, but it is my understanding with the appeal I am currently working on, the court typically grants such extensions.

Thanks,

Patrick B. Ford, Attorney



Florence Office/Main Office
814 West Evans Street (29501)
Post Office Box 1317
Florence, SC 29503-1317
p / 843.317.4900

Clark Anderson

From: Malloy McEachin <malloy@mceachinlawfirm.com>
Sent: Friday, October 18, 2019 9:00 AM
To: Patrick Ford; Quattlebaum, Derrick; Clark Anderson
Subject: RE: Yates v. MetLife et al.

Follow Up Flag: Follow up
Flag Status: Completed

I consent.

Malloy McEachin
McEachin & McEachin
180 N. Irby St., Room 503
Florence, SC 29501
Phone: 843.665.0135
Fax: 843.665.0716
Email: malloy@mceachinlawfirm.com

From: Patrick Ford [mailto:pford@finklealaw.com]
Sent: Thursday, October 17, 2019 5:47 PM
To: Quattlebaum, Derrick; Clark Anderson
Cc: Malloy McEachin
Subject: RE: Yates v. MetLife et al.

Malloy,

Do you consent?

Thanks,

Patrick B. Ford, *Attorney*



Florence Office/Main Office
814 West Evans Street (29501)
Post Office Box 1317
Florence, SC 29503-1317
p / 843.317.4900
f / 843.317.4910
e / pford@finklealaw.com

Marion Office
2554 E. Highway 76
Marion, SC 29571
p / 843.433.8276

Hemingway Office
101 S. Main Street
Hemingway, SC 29554
p / 843.551.0051

US POSTAGE
FIRST-CLASS
062S0007987496
FROM 29501



B4460702

stamps



FINKLEA LAW FIRM
ATTORNEYS AND COUNSELORS AT LAW

814 West Evans Street • PO Box 1317 • Florence, S.C. 29503 • (843) 317-4900

TO:

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
P.O. Box 11330
Columbia, SC 29211