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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2019-001506  
Trial Court Case No: 2017-CP-23-00311

**RECEIVED**  
NOV 01 2019  
SC Court of Appeals

Ex Parte: Trustgard Insurance Company .....Appellant-Respondent

In Re:

Terrence Graham,.....Plaintiff

-v-

Full Logistics, Inc.,..... Defendant

Of Whom Terrance Graham is the .....Respondent-Appellant

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANT-RESPONDENT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER**

Ex-Parte Trustgard Insurance Company, the Appellant-Respondent, by and through its undersigned counsel, hereby moves for a thirty (30) day extension of time to finalize and file its initial brief and designation of matter. Currently the Appellant-Respondent's initial brief and designations are due by November 7, 2019. The reason for requesting the extension is that due to scheduling conflicts and deadlines, counsel has not had adequate time to prepare to complete these matters.

Therefore, for the foregoing reasons, and Pursuant to Rule 263(a), SCACR, the undersigned counsel moves for an extension of time. Undersigned counsel would further certify that he has consulted with counsel for the Respondent-Appellant, William F. Barnes, III, and counsel for Defendant, Dorothy H, Hogg who consents to Appellant-Respondent's request for an additional thirty (30) day extension of time to file its initial brief and designation of matter.

Should the Court grant Appellant-Respondent's request, the Initial Brief and Designation of Matter will be due on or before December 7, 2019.

Respectfully Submitted,  
COLLINS & LACY, PC

By: 

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(803) 256-2660  
*Attorneys for Appellant-Respondent Ex-Parte  
Trustgard Insurance Company*

October 31, 2019  
Columbia, South Carolina

Other Counsel of Record:  
William F. Barnes, III, Esquire  
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK, P.A.  
101 Mulberry Street East  
P.O. Box 457  
Hampton, SC 29924  
*Attorney for Respondent, Terrence Graham*

Brian T. Smith, Esquire  
714 Pettigru Street  
Greenville, SC 29601  
*Attorney for Respondent, Terrence Graham*

Ms. Dorothy Holley Hogg, Esquire  
FULCHER HAGLER, LLP  
PO Box 1477  
Augusta, GA 30903-147  
*Attorney for Defendant, Full Logistics, Inc.*

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**PROOF OF SERVICE**

This is to certify that I, Victoria L. Baker, with the Law Firm of Collins and Lacy, PC, Attorneys for Appellant-Respondent, have this date mailed via the U.S. Postal Service with first class postage, prepaid, a true and correct copy of the within *Motion for Extension of Time to File Appellant-Respondent's Initial Brief and Designation of Matter* to:

William F. Barnes, III, Esquire  
Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A.,  
P.O. Box 457  
Hampton, SC 29924

-and-

Brian T. Smith, Esquire,  
714 Pettigru Street  
Greenville, SC 2960

Dorothy Holley Hogg, Esquire  
Fulcher Hagler, LLP  
Post Office Box 1477  
Augusta, GA 30903-147

*Attorney for Defendant*

*Attorneys for Respondent-Appellant*

*Victoria L Baker*  
Victoria L. Baker

October 31, 2019

Columbia, South Carolina



Michael R. Burchstead | D: 803.255.0445 | E: mburchstead@collinsandlacy.com

October 31, 2019

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
Post Office Box 1629  
Columbia, SC 29211-1629

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SC Court of Appeals

Re: Ex Parte Trustgard Insurance Company Appellant-Respondent  
in Re:  
Terence Graham v. Full Logistics, Inc.,  
of Whom Terence Graham is Respondent-Appellant  
**Appellate Case No: 2019-001506**  
Claim No. ACV1698091  
C&L File No. 001788-00137

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of the Appellant-Respondent's Motion for Extension of time in the above-referenced matter. Please file the original and return the clocked copy in the self-addressed stamped envelope herein provided, along with our firm's check in the amount of \$50.00 for the required filing fee.

By copy of this letter, all counsel of record is being notified of our request for an extension of time.

With kind regards, I am

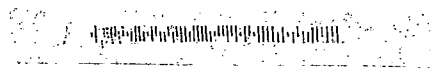
Sincerely,

A handwritten signature in black ink, appearing to read "Michael R. Burchstead".

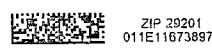
Michael R. Burchstead

MRB/vlb  
Enclosures – as stated

cc w/ encl:  
William F. Barnes, III, Esquire  
Brian T. Smith, Esquire  
Dora H. Hogg, Esquire



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1330 Lady Street, Sixth Floor (29201) Post Office Box 12487 | Columbia, SC 29211

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211  
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