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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
DEC 27 2019
SC Court of Appeals

Ex Parte: Trustgard Insurance CompanyAppellant-Respondent

In Re:

Terrence Graham,.....Plaintiff

-v-

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

Of Whom Terrance Graham is theRespondent-Appellant

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT-RESPONDENT'S REPLY BRIEF**

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 Reply Brief to Respondent-Appellant Terence Graham's Initial Brief and Designation of Matter. 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, who consents to Appellant-Respondent's request for an additional thirty (30) day extension of time to file its Reply Brief.

Should the Court grant Appellant-Respondent's request, the Reply Brief of Appellant-Respondent Trustgard Insurance Company will be due on or before **January 23, 2020**.

Respectfully Submitted,
COLLINS & LACY, PC

By: _____


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*Attorneys for Appellant-Respondent Ex-Parte
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December 24, 2019
Columbia, South Carolina

Other Counsel of Record:
William F. Barnes, III, Esquire
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101 Mulberry Street East
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Hampton, SC 29924
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Attorney for Respondent, Terrence Graham

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Attorney for Defendant, Full Logistics, Inc.

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PROOF OF SERVICE

I certify that I have served Appellant-Respondent Trustgard Insurance Company's *Consent Motion for Extension of Time to File Appellant-Respondent's Reply Brief* on the following counsel for Respondent-Appellants Terrance Graham and Defendant Full Logistics, Inc. and on counsel for Defendant by mailing via USPS first class mail, a copy of same, on December 27, 2019:

Willian 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

Dorothy Holley Hogg, Esquire
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Post Office Box 1477
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Attorney for Defendant

Greenville, SC 2960

Attorneys for Respondent-Appellant



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Attorneys for Appellant



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Senior Paralegal

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

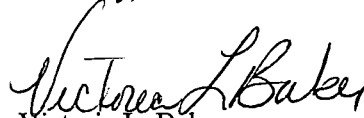
Re: Ex Parte Trustgard Insurance Company Appellant-Respondent
in Re: Terence Graham v. Full Logistics, Inc., of Whom Terence Graham is
Respondent-Appellant
Appellate Case No: 2019-001506
Claim No. ACV1698091
C&L File No. 001788-00137

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.

Sincerely,


Victoria L. Baker
Senior Paralegal

Enclosures – as stated

cc w/ encl:

William F. Barnes, III, Esquire
Brian T. Smith, Esquire
Dora H. Hogg, Esquire

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SC Court of Appeals

Collins & Lacy
ATTORNEYS AT LAW

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The Honorable Jenny Abbott Kitchings
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