

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

FEB 05 2020

SC Court of Appeals

The Honorable Robin B. Stilwell, Circuit Court Judge

Appellate Case No.: 2019-001506
Trial Court Case No.: 2017CP2300311

Ex Parte: Trustgard Insurance Company, Appellant-Respondent,

In Re:

Terrence Graham, Plaintiff,

-v-

Full Logistics, Inc., Defendant,

Of whom, Terrence Graham, is Respondent-Appellant.

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

PLEASE take notice that Terrence Graham ("Respondent-Appellant"), by and through his undersigned counsel, moves for a thirty (30) day extension of time within which to file his respondent initial brief and designation of matter. Respondent-Appellant's initial brief is currently due by February 7, 2020. The reason for this request is due to numerous schedule conflicts and deadlines that has not allowed counsel adequate preparation time to complete these matters.

For these reasons, the undersigned moves for an extension of time pursuant to Rule 263(a), SCACR. The undersigned attorney for the Respondent-Appellant hereby certifies that he has consulted with counsel for Appellant-Respondent, Trustgard Insurance Company, and counsel for Full Logistics who do not object to Respondent-Appellant's request for an additional thirty (30) day extension of time to file his initial brief and designation of matter. This will be the last extension requested by Respondent-Appellant Graham.

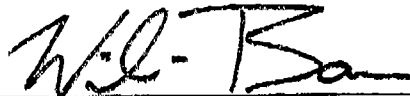
Should the Court grant Respondent-Appellant's request, Respondent's Initial Brief and Designation of Matter of Respondent-Appellant Terrence Graham will be due for service on or before March 9, 2020.

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

February 5, 2020
Hampton, South Carolina

BY: _____



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-And-

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Attorneys for Respondent-Appellant

Other Counsel of Record:

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Attorney for Defendant, Full Logistics, Inc.

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Post Office Box 12487
Columbia, SC 29211
Attorneys for Appellant-Respondent

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Ex Parte: Trustgard Insurance Company, Appellant-Respondent,

In Re:

Terrence Graham, Plaintiff,

-v-

Full Logistics, Inc., Defendant,

Of whom, Terrence Graham, is Respondent-Appellant.

PROOF OF SERVICE

This is to certify that I, *Megan C. Davis*, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent-Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within the *Motion for an Extension of Time to File Respondent's Initial Brief and Designation of Matter of Respondent-Appellant Terrence Graham* to:

Peter H. Dworyany, Esquire
Michael R. Burchstead, Esquire
Collins & Lacy, PC
Post Office Box 12487
Columbia, SC 29211

Dorothy Holley Hogg, Esquire
Fulcher Hagler, LLP
Post Office Box 1477
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February 5, 2020
Hampton, South Carolina


Megan C. Davis

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SC Court of Appeals

FAX COVER SHEET

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RE: Ex. Parte: Trustgard Ins Company, Appellate Case No. 2019-001506

PAGES: 6 (INCLUDING COVER PAGE)

DATE: 2/5/2020

IF YOU DO NOT RECEIVE ALL PAGES OR IF YOU INCUR ANY PROBLEMS WITH THIS TRANSMISSION, PLEASE CALL (803) 943-2111.

LAW OFFICES
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

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February 5, 2020

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Via Fax & U.S. Mail

The Honorable Jenny Abbott Kitchings
 S.C. Court of Appeals Clerk of Court
 Post Office Box 11629
 Columbia, SC 29211-1629

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*Re: Ex. Parte: Trustgard Insurance Company
 Appellate Case No.: 2019-001506*

FEB 05 2020

SC Court of Appeals

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter of Respondent-Appellant Terence Graham in the above-referenced case. Please file the original and return a clocked copy of same in the self-addressed stamped envelope provided.

In addition, please find our check in the amount of \$50.00 for the 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,


William F. Barnes, III

WFB/mcd
 Enclosures as stated

cc: Peter H. Dworjanyn, Esquire
 Michael Reid Burchstead, Esquire
 Brian T. Smith, Esquire
 Dorothy H. Hogg, Esquire
 Shelley Montague, Esquire
 Janice Holmes, Esquire