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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, Judicial Circuit Court Judge  
Trial Court Case No.: 2017-CP-23-00311**

**Appellate Case No. 2019-001506**

**RECEIVED**

**FEB 06 2020**

**SC Court of Appeals**

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

**In Re:**

**Terence Graham, .....Plaintiff,**

**v.**

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

**Of Whom Terence Graham is the ..... Respondent-Appellant.**

**Consent Motion for Extension of Time to File Response Brief on Behalf of Appellant-  
Respondent Trustgard Insurance Company**

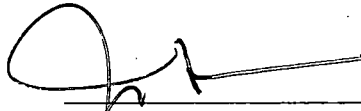
Pursuant to Rule 263(b), SCACR, Appellant-Respondent Trustgard Insurance Company ("Trustgard") hereby requests a thirty-day extension of time in which to serve and file its Response Brief to Respondent-Appellant's Initial Brief and Designation of Matter. This is Trustgard's second request for an extension. This request is made because the undersigned counsel with Gallivan, White & Boyd, PA have recently made appearances in this matter and need additional time to prepare to complete these matters.

Undersigned counsel certifies that she has consulted with counsel for the Respondent-

Appellant, William F. Barnes, III, who consents to Appellant-Respondent's request for an additional thirty-day extension of time to file its Response Brief.

Should the Court grant Appellant-Respondent's request, the Response Brief of Appellant-Respondent will due on or before **Friday, March 13, 2020.**

Respectfully Submitted,



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Janice Holmes (S. C. Bar No. 75038)  
Shelley S. Montague (S.C. Bar. No. 68019)  
Gallivan, White & Boyd, P.A.  
1201 Main Street, Suite 1200  
Post Office Box 7368  
Columbia, South Carolina 29202  
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Facsimile: 803-779-1767

*Attorneys for Appellant-Respondent Trustgard  
Insurance Company*

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**Of Whom Terence Graham is the ..... Respondent-Appellant.**

**Proof of Service**

I certify that I have served the Consent Motion for Extension of Time to file Response Brief on Behalf of Appellant-Respondent Trustgard Insurance Company on the following counsel for Respondent-Appellant Terrance Graham and Defendant Full Logistics, Inc. by depositing a copy of it in the United States Mail, postage prepaid on February 6, 2020:

William F. Barnes, III  
Peters, Murdaugh, Parker, Eltzroth & Detrick, PA  
Post Office Box 457  
Hampton, SC 29924  
wbarnes@pmped.com

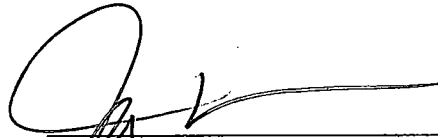
and

Brian T. Smith  
714 Pettigru Street  
Greenville, SC 29601  
bsmith@btsmithlaw.com

*Attorneys for Respondent-Appellant Terence Graham*

Dorothy Holley Hogg  
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P.O. Box 1477  
Augusta, GA 30903-147  
dhogg@fulcerhlaw.com

*Attorney for Defendant Full Logistics, Inc.*



Janice Holmes (S. C. Bar No. 75038)  
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*Attorneys for Appellant-Respondent Trustgard  
Insurance Company*

February 6, 2020

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FEB 06 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
South Carolina 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., Defendant, of whom Terence Graham is  
Respondent-Appellant  
Appellate Case No.: 2019-001506  
GWB File No.: 10006-1

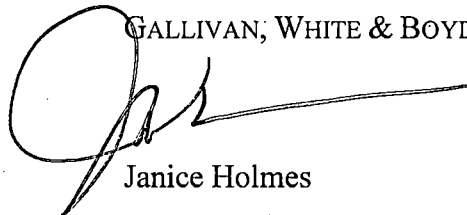
Dear Ms. Kitchings:

Enclosed for filing with your office are the original and six (6) copies of Appellant-Respondent Trustgard Insurance Company's Consent Motion for Extension of Time to File Response Brief in the above-referenced matter. Also, enclosed is a check in the amount of \$50.00 for the associated filing fee. I would appreciate you filing the original and returning a clocked copy to me by the awaiting individual from our office.

With kind regards, I am

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Janice Holmes

JH:ammo  
Enclosures  
Cc: All Counsel of Record (via email only)