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IN 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

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FEB 07 2020

SC Court of Appeals

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: 

William F. Barnes, III
101 Mulberry Street, East
P.O. Box 457
Hampton, SC 29924
Phone: (803) 943-2111
Email: wbarnes@pmped.com

-And-

Brian T. Smith, Esquire
714 Pettigru Street
Greenville, SC 29601
Phone: (864) 239-2007
Email: bsmith@btsmithlaw.com
Attorneys for Respondent-Appellant

Other Counsel of Record:

Dorothy Holley Hogg, Esquire
Fulcher Hagler, LLP
Post Office Box 1477
Augusta, GA 30903-1477
Attorney for Defendant, Full Logistics, Inc.

Peter H. Dworyanyn, Esquire
Michael R. Burchstead, Esquire
Collins & Lacy, PC
Post Office Box 12487
Columbia, SC 29211
Attorneys for Appellant-Respondent

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Ex Parte: Trustgard Insurance Company, Appellant-Respondent,

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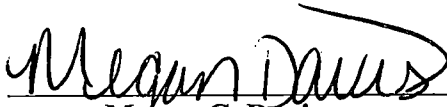
PROOF OF SERVICE

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. Dworyanyn, 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
Augusta, GA 30903-147

February 5, 2020
Hampton, South Carolina


Megan C. Davis

LAW OFFICES
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK

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(1887-1940)
RANDOLPH MURDAUGH, JR.
(1915-1998)
J. ROBERT PETERS, JR.
(1927-2008)
J. PAUL DETRICK
(1948-2016)
CLYDE A. ELTZROTH, JR. - RET

February 5, 2020

William F. Barnes, III
Direct Dial: (803) 914-6702
Email: wbarnes@pmped.com
Paralegal: mdavis@pmped.com

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

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

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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

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Hampton, South Carolina 29924

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TO:

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

