

92381

RECEIVED
MAR 09 2020
SC Court of Appeals

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

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.

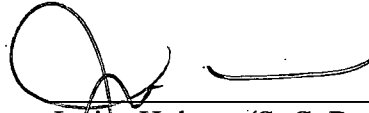
**Consent Motion for Extension of Time to File Reply Brief on Behalf of Appellant-
Respondent Trustgard Insurance Company**

Pursuant to Rule 263(b), SCACR, Appellant-Respondent Trustgard Insurance Company (“Trustgard”) hereby requests a ten-day extension of time in which to serve and file its Reply Brief. This request is being made to allow Trustgard additional time to respond to the issues raised in Respondent-Appellant’s Initial Response Brief.

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 a ten-day extension of time to file its Reply Brief.

Should the Court grant Appellant-Respondent's request, the Reply Brief of Appellant-Respondent will due on or before **Monday, March 23, 2020.**

Respectfully Submitted,



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
Telephone: 803-779-1833
Facsimile: 803-779-1767

*Attorneys for Appellant-Respondent Trustgard
Insurance Company*

**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**

RECEIVED
MAR 09 2020
SC Court of Appeals

Appellate Case No. 2019-001506

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.

Proof of Service

I certify that I have served the Consent Motion for Extension of Time to file Reply Brief on Behalf of Appellant-Respondent Trustgard Insurance Company on the following by depositing a copy of it in the United States Mail, postage prepaid on March 9, 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
Fulcher Hagler, LLP
P.O. Box 1477
Augusta, GA 30903-147
dhogg@fulcherhlaw.com

Attorney for Defendant Full Logistics, Inc.



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
Telephone: 803-779-1833
Facsimile: 803-779-1767

*Attorneys for Appellant-Respondent Trustgard
Insurance Company*

March 9, 2020

March 9, 2020

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

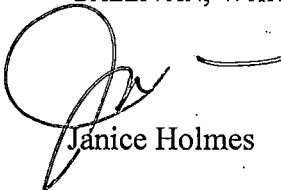
Dear Ms. Kitchings:

Enclosed for filing with your office are the original and six (6) copies of the Consent Motion for Extension of Time to File Reply Brief on Behalf of Appellant-Respondent Trustgard Insurance Company 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

RECEIVED

MAR 09 2020

SC Court of Appeals