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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

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

**RECEIVED**  
MAR 19 2020  
SC Court of Appeals

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 REPLY BRIEF OF  
RESPONDENT-APPELLANT TERRENCE GRAHAM

PLEASE take notice that Terrence Graham (“Respondent-Appellant”), by and through his undersigned counsel, moves for a ten (10) day extension of time within which to file his Reply Brief. Respondent-Appellant’s Reply Brief is currently due by March 23, 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, Janice Holmes, who consents to

Respondent-Appellant's request for an additional ten (10) day extension of time to file his Reply Brief.

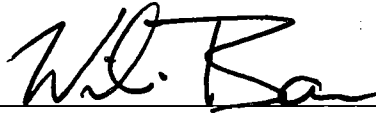
Should the Court grant Respondent-Appellant's request, Respondent-Appellant's Reply Brief will be due for service on or before April 2, 2020.

Respectfully submitted,

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

March 17, 2020  
Hampton, South Carolina

BY: \_\_\_\_\_

  
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-And-

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1201 Main Street, Suite 1200  
Columbia, SC 29201  
*Attorneys for Appellant-Respondent*

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PROOF OF SERVICE

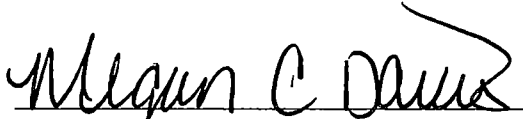
This is to certify that I, **Megan C. Davis**, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent-Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within the **Motion for an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

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

Dorothy Holley Hogg, Esquire  
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Post Office Box 1477  
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March 17, 2020  
Hampton, South Carolina

  
Megan C. Davis

LAW OFFICES  
**PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK**

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(1927-2008)  
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(1948-2016)  
CLYDE A. ELTZROTH, JR. - RET

March 16, 2020

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

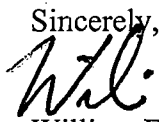
*Re: Ex. Parte: Trustgard Insurance Company  
Appellate Case No.: 2019-001506*

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of the Motion for Extension of Time to File Reply Brief 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.

With kind regards, I am

Sincerely,  
  
William F. Barnes, III

WFB/mcd  
Enclosures as stated

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

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TO:

The Honorable Jenny Abbott Kitchings  
S.C. Court of Appeals Clerk of Court  
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