

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

C.A. No.: 2011-CP-10-00387

Appellate Case No.: 2016-001140

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APR - 6 2020

S.C. SUPREME COURT

PCS Nitrogen, Inc.Petitioner,

v.

Continental Casualty Company, Admiral Insurance Company,
United States Fire Insurance Company, ACE Property &
Casualty Insurance Company, Certain Underwriters at Lloyd's London,
the Aviva Companies, the Winterthur Companies, Certain London
Market Insurance Companies, Providence Washington Insurance
Company (as Successor in Interest by way of Merger to Seaton
Insurance Company, f/k/a Unigard Mutual Insurance Company,
Berkshire Hathaway Specialty Insurance Company (f/k/a Stonewall
Insurance Company), Lexington Insurance Company, Starr
Indemnity & Liability Company (f/k/a Republic Insurance Company),
First State Insurance Company, Century Indemnity Company (f/k/a
California Union Insurance Company and Insurance Company of
North America.....Respondents.

MOTION FOR EXTENSION OF TIME

On behalf of all Respondents, Continental Casualty Company, Admiral Insurance
Company, United States Fire Insurance Company, ACE Property & Casualty Insurance Company,
Certain Underwriters at Lloyd's London, the Aviva Companies, the Winterthur Companies,
Certain London Market Insurance Companies, Providence Washington Insurance Company (as

Successor in Interest by way of Merger to Seaton Insurance Company, f/k/a Unigard Mutual Insurance Company, Berkshire Hathaway Specialty Insurance Company (f/k/a Stonewall Insurance Company), Lexington Insurance Company, Starr Indemnity & Liability Company (f/k/a Republic Insurance Company), First State Insurance Company, Century Indemnity Company (f/k/a California Union Insurance Company and Insurance Company of North America (hereinafter referred to as "Respondents")), we hereby request this Honorable Court for an extension of time in which to file their Return to Petition for Writ of Certiorari of Petitioner, PCS Nitrogen, filed March 12, 2020, (hereinafter referred to as the "Reply") on the following grounds:

1. The Reply was initially due April 10, 2020, which was extended to April 30, 2020. *See* Rule 242(f), S.C.A.C.R. ; Order 2020-03-20-01 § I(1).

2. Though the draft of the Reply will be written by one attorney, there are a number of Respondents who, along with their respective counsel, will need to review and approve the same, who are scattered throughout the United States and other countries;

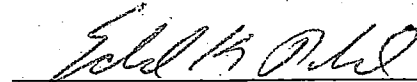
3. It is anticipated that during the current coronavirus (COVID-19) emergency, many of the attorneys and Respondents will be social distancing and taking other measures, and, therefore, will be difficult to reach and/or unavailable due to their responsible efforts to prevent and/or thwart the spread coronavirus (COVID-19).

4. That, in view of the forgoing, it is anticipated that an additional extension is necessary to allow time for review and approval of the Reply by all Respondents and their respective counsel before the Reply can be filed.

Therefore, all Respondents respectfully request this Honorable Court to extend the deadline to file their Return to Petition for Writ of Certiorari of Petitioner, PCS Nitrogen, filed March 12, 2020, until June 10, 2020.

Respectfully submitted on behalf of Respondents,

PRITCHARD LAW GROUP, LLC



Edward K. Pritchard, III, Esq.
8 Cumberland Street, Suite 200
Post Office Box 630
Charleston, SC 29402
Phone: (843) 722-3300
Fax (843) 722-3379

-and-

Richard McDermott, Esq.
Seth M. Jaffe, Esq.
Hinkhouse Williams Walsh LLP
180 North Stetson Ave.
Suite 3400
Chicago, IL 60601
(312) 784-5413

***Attorneys for Defendants:
Certain Underwriters at Lloyd's, London, Certain
Aviva Companies, Certain Winterthur Companies,
New London Reinsurance Company Limited, The
Scottish Lion Insurance Company Limited,
Berkshire Hathaway Specialty Insurance Company
(f/k/a Stonewall Insurance Company), and Starr
Indemnity & Liability Company (f/k/a Republic
Insurance Company)***

Adam J. Neil, Esq.
Wesley B. Sawyer, Esq.
Murphy & Grantland, PA
4406 Forest Drive, Suite B
Columbia, SC 29260
Attorneys for Admiral Insurance Company

Robert H. Hood, Jr., Esq.
Hood Law Firm, LLC
172 Meeting Street
Charleston, SC 29402

-and-

Admitted Pro Hac Vice

Robert F. Walsh, Esq.,

Thomas M. Going, Esq.

Patricia B. Santelle, Esq.

White and Williams, LLP

1650 Market Street

One Liberty Place, Suite 1800

Philadelphia, PA 19103-7395

***Attorneys for Ace Property & Casualty Insurance
Company and US Fire Insurance Company***

Morgan S. Templeton, Esq.

Wall Templeton & Haldrup, PA

145 King Street, Suite 302

Charleston, SC 29401

-and-

Admitted Pro Hac Vice

Patrick F. Hofer, Esq.

Troutman Sanders, LLP

401 Ninth Street, Ste 1000

Washington, DC 20004-2134

Attorneys for Continental Casualty Company

R. Scott Wallinger, Jr. Esq.

Christian Stegmaier, Esq.

Collins & Lacy, PC

1330 Lady Street, 6th Floor

Columbia, SC 29211

-and-

Admitted Pro Hac Vice

John S. Favate, Esq.

Michael J. Forino, Esq.

Hardin, Kundla, McKeon & Polletto

673 Morris Avenue

Springfield, NJ 07081

***Attorneys for United States Fire Insurance
Company***

John T. Lay, Jr., Esq.

Gallivan, White & Boyd, P.A.

40 Calhoun Street, Suite 315

Charleston, SC 29401

-and-

Tanguy Le Gouellec de Schwarz, Esq.

Foran Glennon

11 Leadenhall Street, 3rd Floor

London

EC3V 1LP

Attorneys for Certain London Market Insurance Companies

Molly Poag, Esq.

Harry Lee, Esq.

Steptoe and Johnson, LLP

1330 Connecticut Ave., NW

Washington, DC 20036

-and-

Elizabeth J. Palmer, Esq.

Rosen Rosen Hagood, LLC

151 Meeting Street, Suite 400

Charleston, SC 29401

Attorneys for Unigard Mutual Insurance Company

Paul Parker, Esq.

Wayne Karbal, Esq.

Karbal Cohen Economou Silk Dunne, LLC

150 S. Wacker Drive, Suite 1700

Chicago, IL 60606

-and-

R. Michael Ethridge, Esq.

Carlock Copeland & Stair, LLP

40 Calhoun Street, Ste 400

Charleston, SC 29401

Attorneys for First State Insurance Company

John C. Bonnie, Esq.

Weinberg Wheeler Hudgins Gunn & Dial

3344 Peachtree Road NE

Suite 2400

Atlanta, GA 30326

Attorneys for Lexington Insurance Company

March 30, 2020

Charleston, South Carolina

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v.

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United States Fire Insurance Company, Ace Property &
Casualty Insurance Company, Home Insurance Company,
Certain Underwriters at Lloyd's London, The Aviva
Companies, The Winterthur Companies, Certain London
Market Insurance Companies, Unigard Mutual Insurance
Company, Berkshire Hathaway Specialty Insurance
Company (F/K/A Stonewall Insurance Company), Lexington
Insurance Company, Republic-Vanguard Insurance
Company (F/K/A Republic Insurance Company), First State
Insurance Company, Century Indemnity Company (F/K/A
California Union Insurance Company and Insurance
Company of North America.....Respondents.

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PROOF OF SERVICE

I hereby certify that I have served all counsel in this action with a copy of *Motion for Extension of Time* herein specified below by e-mailing the same to their attorney of record as follows:

Wm. Howell Morrison, Esq.
Haynsworth Sinkler Boyd, PA
134 Meeting Street, 3rd Floor
Charleston, SC 29401

-and-

Admitted Pro Hac Vice
Michael H. Ginsberg, Esq.

Jones Day

One Mellon Center
500 Grant Street, Ste 4500
Pittsburgh, PA 15219

Attorneys for Plaintiff, PCS Nitrogen, Inc.

Adam J. Neil, Esq.
Wesley B. Sawyer, Esq.
Murphy & Grantland, PA
4406 Forest Drive, Suite B
Columbia, SC 29260

Attorneys for Admiral Insurance Company

Robert H. Hood, Jr., Esq.
Hood Law Firm, LLC
172 Meeting Street
Charleston, SC 29402

-and-

Admitted Pro Hac Vice

Robert F. Walsh, Esq.,
Thomas M. Going, Esq.
Patricia B. Santelle, Esq.

White and Williams, LLP

1650 Market Street
One Liberty Place, Suite 1800
Philadelphia, PA 19103-7395

*Attorneys for Ace Property & Casualty
Insurance Company and US Fire Insurance
Company*

Molly Poag, Esq.
Harry Lee, Esq.
Steptoe and Johnson, LLP
1330 Connecticut Ave., NW
Washington, DC 20036

-and-

Morgan S. Templeton, Esq.
Wall Templeton & Haldrup, PA
145 King Street, Suite 302
Charleston, SC 29401

-and-

Admitted Pro Hac Vice
Patrick F. Hofer, Esq.

Troutman Sanders, LLP

401 Ninth Street, Ste 1000
Washington, DC 20004-2134

*Attorneys for Continental Casualty
Company*

R. Scott Wallinger, Jr. Esq.
Christain Stegmaier, Esq.
Collins & Lacy, PC
1330 Lady Street, 6th Floor
Columbia, SC 29211

-and-

Admitted Pro Hac Vice

John S. Favate, Esq.

Michael J. Forino, Esq.

Hardin, Kundla, McKeon & Polletto

673 Morris Avenue
Springfield, NJ 07081

*Attorneys for United States Fire Insurance
Company*

John T. Lay, Jr., Esq.

Gallivan, White & Boyd, P.A.

40 Calhoun Street, Suite 315
Charleston, SC 29401

-and-

Tanguy Le Gouellec de Schwarz, Esq.

Foran Glennon

11 Leadenhall Street, 3rd Floor
London

EC3V 1LP

*Attorneys for Certain London Market
Insurance Companies*

John C. Bonnie, Esq.

Weinberg Wheeler Hudgins Gunn & Dial

3344 Peachtree Road NE
Suite 2400

Atlanta, GA 30326

Attorneys for Lexington Insurance Company

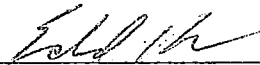
Elizabeth J. Palmer, Esq.
Rosen Rosen Hagood, LLC
151 Meeting Street, Suite 400
Charleston, SC 29401
*Attorneys for Unigard Mutual Insurance
Company*

Paul Parker, Esq.
Wayne Karbal, Esq.
Karbal Cohen Economou Silk Dunne, LLC
150 S. Wacker Drive, Suite 1700
Chicago, IL 60606

-and-

R. Michael Ethridge, Esq.
Carlock Copeland & Stair, LLP
40 Calhoun Street, Ste 400
Charleston, SC 29401
*Attorneys for First State Insurance
Company*

PRITCHARD LAW GROUP, LLC



Edward K. Pritchard, III, Esquire
8 Cumberland Street, Suite 200 (29401)
Post Office Box 620
Charleston, South Carolina 29402
Phone: (843) 722-3300
Fax: (843) 722-3379
epritchard@pritchardlawgroup.com
liz@pritchardlawgroup.com

*Attorneys for Certain Underwriters at Lloyd's,
London, Certain Aviva Companies, Certain
Winterthur Companies, New London Reinsurance
Company Limited, The Scottish Lion Insurance
Company Limited, Berkshire Hathaway Specialty
Insurance Company (f/k/a Stonewall Insurance
Company), and Starr Indemnity & Liability
Company (f/k/a Republic Insurance Company)*

March 30, 2020
Charleston, South Carolina