

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Appellate Case No. 2020-000203

Shannon P. Green,
and Darrell Russell,

Appellant-Respondent,

v.

Edward C. McGee,
and David Hudgins,

Respondent,
Respondent-Appellant,

JOINT MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant-Respondent Shannon P. Green and Respondent-Appellant David Hudgins hereby move for an extension of time to file their initial brief. Due to counsel having been out of town on various other matters and other upcoming travel plans and pending matters, counsel respectfully request a fifty (50) day extension of time to serve and file their Initial Brief.¹ All counsel have consented to this motion. Pursuant to the South Carolina Supreme Court's Order on the Operation of the Appellate Courts During the Coronavirus Emergency, no filing fee is enclosed herewith.

¹ Counsel communicated with the Clerk of Court's Office, who confirmed that the initial deadline for filing Initial Briefs had been calendared for July 1, 2020. Due to the South Carolina Supreme Court's Amended Order filed May 29, 2020 regarding the Operation of the Appellate Courts During the Coronavirus Emergency, out of an abundance of caution and as not to run afoul of any current deadlines, counsel has requested the original twenty (20) day automatic extension that was confirmed by the

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Jun 10 2020

SC Court of Appeals

June 10, 2020

s/ James A. Bradshaw

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Other Counsel of Record:

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Attorney for Respondent Progressive Direct Insurance Company

Clerk's office as well as an additional thirty (30) day extension.

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Respondent-Appellant

PROOF OF SERVICE

I certify that I have served the Joint Motion for Extension of Time to File Initial Brief on all attorneys of record, by depositing a copy of it in the United States Mail, postage prepaid on June 10, 2020, addressed as follows:

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Complex experience for complex matters

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Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

**Re: Shannon P. Green and Darrell Russell v. Edward C. McGee and David Hudgins
Appellate Case No. 2020-000203**

Dear Ms. Kitchings:

Enclosed please find our Joint Motion for Extension of Time to File Initial Brief in the above-referenced matter along with Proof of Service. I would appreciate if you would file the original and return a clocked copy.

If you have any questions, please do not hesitate to contact me.

With kind regards, I am,

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Drew Bradshaw

JAB/meb

Enclosures

cc: Douglas A. Churdar, Esq. (via US Mail & email)
Michael T. Coulter, Esq. (via US Mail & email)