

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
Roger M. Young, Sr., Circuit Court Judge

Case No.: 2014-CP-08-02757

Appellate Case No.: 2020-000735

Portrait Homes – South Carolina,
LLC; Portrait Homes – Persimmon
Hill, LLC; and The Persimmon Hill
Homeowners Association, Inc.,

Respondents,

v.

Pennsylvania National Mutual
Casualty Insurance Company

Appellant.

**MOTION FOR SECOND EXTENSION OF TIME TO FILE INITIAL BRIEF OF
RESPONDENT AND DESIGNATION OF MATTER**

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Respondent, Persimmon Hill Homeowners Association, Inc., by and through counsel, respectfully requests a twenty-day extension of time to file its initial brief and designation of matter. Respondent requests this extension because of scheduling issues caused by the ongoing coronavirus pandemic as well as numerous other deadlines and professional obligations of counsel. This is the second extension request for Respondent's initial brief and designation of matter.

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The current deadline for Respondent's initial brief and designation of matter is September 11, 2020. With the twenty-day extension, the new deadline would be October 1, 2020.

Respondent requests that the current deadline be held in abeyance until this Court issues an order on this motion.

THE CHAKERIS LAW FIRM

By: *s/Alicia D. Petit*
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*Attorneys for Respondent Persimmon Hill
Homeowners Association, Inc.*

Charleston, South Carolina
Dated: September 3, 2020

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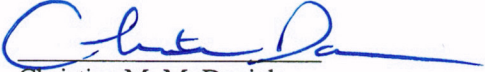
Appellant.

CERTIFICATE OF SERVICE

I, Christine M. M. Daniels, an employee of the Chakeris Law Firm, certify that I have served the *Motion for Second Extension of Time to File Initial Brief of Respondent and Designation of Matter*, by depositing a copy in the United States Mail, postage prepaid, on September 3, 2020, addressed to all attorneys of record, as follows:

Stanley C. Rodgers
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John I. Malone, Jr.
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September 3, 2020

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Via E-Mail

The Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *Portrait Homes – South Carolina, LLC, et al. v. Pennsylvania National Mutual Casualty Insurance Company*
Appellate Case No.: 2020-000735

Dear Ms. Kitchings:

Attached please find Respondent Persimmon Hill Homeowners Association, Inc.'s Motion for a Second Extension of Time to File Initial Brief of Respondent and Designation of Matter for filing in the above-referenced matter. This is being filed with the consent of all parties having been given.

Pursuant to Administrative Order 2020-05-29-02, no filing fee is required for this request.

With kind regards, I am

Sincerely,


Alicia D. Petit

ADP/cmmd

cc: John I. Malone, Jr. (*Via E-Mail & 1st Class Mail*)
David L. Brown (*Via E-Mail & 1st Class Mail*)
Stanley C. Rodgers (*Via E-Mail & 1st Class Mail*)
Phillip W. Segui, Jr. (*Via E-Mail Only*)