

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

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

Respondents,

RECEIVED

Oct 01 2020

SC Court of Appeals

v.

Pennsylvania National Mutual
Casualty Insurance Company,

Appellant.

Appellate Case No. 2020-000735

MOTION TO EXTEND TIME TO FILE REPLY BRIEF

Pennsylvania National Mutual Casualty Insurance Company, by and through counsel, and pursuant to South Carolina Rule of Appellate Procedure, Rule 208(a)(3) and Rule 240, moves the Court to extend by Fifteen (15) days the time to file its Reply Brief and shows the Court as follows:

1. Pennsylvania National Mutual Casualty Insurance Company (“Penn National”) filed a Notice of Appeal on April 22, 2020, appealing from a Judgment that was entered on behalf of two separate parties, the Persimmon Hill HOA and Portrait Homes-South Carolina, LLC and Portrait Homes—Persimmon Hill, LLC (collectively “Portrait Homes”).

2. Penn National filed its initial Appellant Brief on July 13, 2020.

3. On September 28, 2020, the Respondents filed separate Respondent’s Briefs addressing operative facts and legal arguments specific to the separate judgments entered for each Respondent in this matter.

4. Penn National’s Reply to these arguments will require separate responses to address the substance of each of the Respondent’s Briefs. Given this fact, as well as the complexity and volume of matters at issue on this appeal, Penn National respectfully requests an additional Fifteen (15) days, through October 23, 2020, to file and serve its Reply Briefs.

5. Counsel for Penn National has conferred with all counsel of record on this matter, and they do not oppose this request for additional time.

October 1, 2020.

s/ John I. Malone, Jr.

John I. Malone Jr.

S.C. State Bar No. 101962

David L. Brown, *admitted pro hac vice*

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Association, Inc.*

October 1, 2020

VIA EMAIL & FEDEX DELIVERY

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
Email: ctappfilings@sccourts.org

RECEIVED
Oct 01 2020
SC Court of Appeals

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

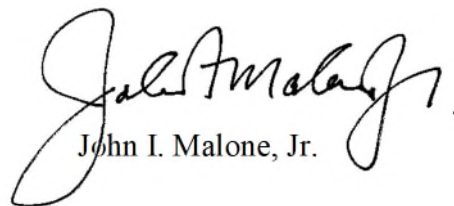
Dear Ms. Kitchings:

I am enclosing an original and six (6) copies of Pennsylvania National Mutual Casualty Insurance Company's Motion to Extend Time to File Appellant Reply Briefs for filing in the above-referenced matter. I am also enclosing our Firm check in the amount of \$50.00.

Please let me know if you have any questions.

Very truly yours,

GOLDBERG SEGALLA, LLP



John I. Malone, Jr.

JIM/drs

Enclosures

cc: Stanley C. Rodgers, Esq. (w/encls via Email)
John T. Chakeris, Esq. (w/encls via Email)
Phillip W. Segui, Jr., Esq. (w/encls via Email)

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