

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

RECEIVED

Oct 28 2020

SC Court of Appeals

Case No. 2016-CP-26-05356
(Court of Appeals Case No. 2020-001245)

Progressive Northern Insurance Co.Respondent,

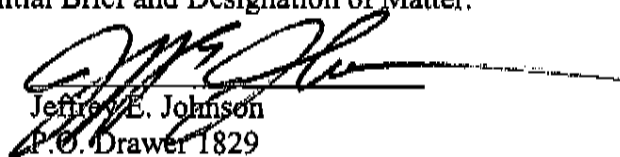
v.

Brandon Lawrence and Ashley Outlaw.....Defendants,
Of whom Brandon Lawrence is the Appellant and Ashley Outlaw is a Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL BRIEF & DESIGNATION OF MATTER**

Appellant moves, pursuant to Rules 240 and 263(b), SCACR, before this Honorable Court for a forty-five (45) day extension to file Appellant's Initial Brief and Designation of Matter. Appellant requested an additional Court transcript in this matter; therefore, Appellant's Initial Brief and Designation of Matter would be due on December 14, 2020 as forty-five (45) days will fall on a weekend. Appellant's grounds for said motion is to allow additional time to receive the additional transcript and prepare the Initial Brief and Designation of Matter.

October 28, 2020



Jeffrey E. Johnson
P.O. Drawer 1829
Conway, SC 29528-1829
Phone: (843) 488-5333
S.C. Bar No. 16835

AND

William V. Josephs, III
Josephs Law Firm
4009 Meeting Street
Loris, SC 29569
Phone: (843) 756-7464
S.C. Bar No. 13464

Attorneys for Appellant

Other Counsel of Record/Respondent:

William P. Davis
Baker, Ravenel & Bender LLP
P.O. Box 8057
Columbia, SC 29202
Phone: (803) 799-9091
S.C. Bar No. 1585
Attorney for Respondent Progressive

Ashley Outlaw
2824 Bethune Highway
Bishopville, SC 29010
Respondent

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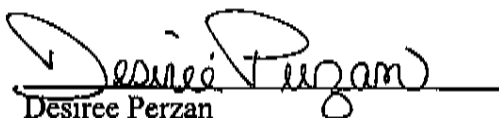
v.

Brandon Lawrence and Ashley Outlaw.....Defendants,
Of whom Brandon Lawrence is the Appellant and Ashley Outlaw is a Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Appellant’s Initial Brief & Designation of Matter on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on October 28, 2020, addressed to its attorney of record William P. Davis of Baker Ravenel & Bender, LLP, P.O. Box 8057, Columbia, South Carolina 29202 and Respondent Ashley Outlaw, 2824 Bethune Highway, Bishopville, SC 29010.

October 28, 2020



Desiree Perzan
Paralegal to Jeffrey E. Johnson
P.O. Drawer 1829
Conway, SC 29528
(843) 488-5333



JEFF JOHNSON
ATTORNEY AT LAW, LLC
1409 Second Avenue
Conway, South Carolina 29526

Reply to: P.O. Drawer 1829
Conway, SC 29528

S.C. Certified Civil Court Mediator

ADMITTED:

United States Supreme Court
South Carolina Supreme Court
United States Court of Appeals 4th Circuit
United States District Court District of South Carolina

Tel: (843) 488-5333
FAX: (843) 488-4290
EMAIL: firm@jjohnsonlaw.net

October 28, 2020

Via U.S. Mail & Facsimile: 803-734-1839
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Progressive Northern Insurance Co. v. Brandon Lawrence
Appellate Case Number: 2020-001245

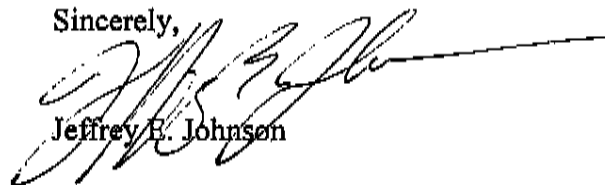
Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced case the original and six (6) copies of the following:

1. Motion for Extension of Time to File Appellant's Initial Brief & Designation of Matter;
2. Proof of Service; and
3. \$50.00 check for payment of filing fee as required by the SC Court of Appeals.

Please file the original with your office and return the clocked copies to my office in the self-addressed stamped envelope enclosed. By copy of this correspondence I am hereby serving all counsel and parties of record with same.

Sincerely,



Jeffrey E. Johnson

JEJ/dp
Enclosures

cc: William P. Davis, Esq.
Ashley Outlaw
William V. Josephs III, Esq.
Client