

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Nov 03 2020

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Alison Renee Lee, Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2017-001946
Trial Court Case No. 2015-CP-18-1571

Progressive Direct Insurance Co. and
USAA General Indemnity Company Petitioners,

v.

Shanna Groves as the Personal Representative
of the Estate of Lynn Harrison Respondent.

**MOTION OF RESPONDENT FOR EXTENSION OF TIME TO FILE RETURN
TO PETITIONERS' PETITION FOR WRIT OF CERTIORARI**

Respondent, Shanna Groves as the Personal Representative of the Estate of Lynn Harrison, hereby moves for, and respectfully requests, a 30-day extension of the deadline for filing and serving her Return to Petitioners Petition for Writ of Certiorari.

Petitioners served their Petition on October 8, 2020. Respondent's Reply is due on November 9, 2020. Counsel has not had adequate time to prepare the brief in Reply to Petitioners' Petition. No previous extension has been requested or granted to Respondent.

The proposed new deadline would be December 9, 2020.

Counsel for the Petitioners have consented to this Motion.

This Motion is made for good cause, in good faith, and not for the purposes of delay.

Respectfully submitted,

By: 

John P. Linton, Jr.

S.C. Bar #79130

WALKER GRESSETTE FREEMAN LINTON,
LLC

P.O. Box 22167

Charleston, SC 29413

(843) 727-2252

Ryan H. Sigal

S.C. Bar #80223

MILLER DAWSON SIGAL & WARD, LLC

8310 Rivers Avenue, Suite D

North Charleston, SC 29406

(843) 284-7780

Attorneys for Respondent

November 3, 2020
Charleston, South Carolina