

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge

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

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NOV 03 2020
SC Court of Appeals

Progressive Northern Insurance Co.Respondent,

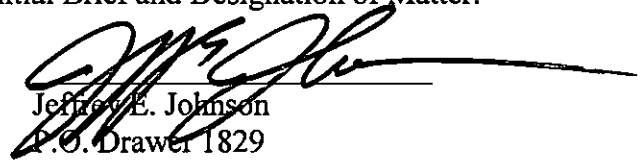
v.

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

THE STATE OF SOUTH CAROLINA
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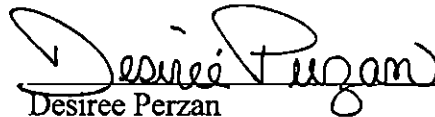
v.

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

Desiree Perzan

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Wednesday, October 28, 2020 1:38 PM
To: firm@jjohnsonlaw.net; jeannie@jjohnsonlaw.net
Cc: Court Of Appeals Filings
Subject: Progressive Northern Insurance Co. v. Brandon Lawrence 2020-001245
Attachments: Progressive v. Lawrence - Ext.pdf

Dear Counsel:

Check was removed. 

The Court has received your filing. A stamped copy is attached for your records.

Due to the current emergency caused by the COVID-19 pandemic, the Court of Appeals is not accepting filing fees for extension requests. See *RE: Operation of the Appellate Courts During the Coronavirus Emergency* (S.C. Sup. Ct. Order dated March 20, 2020, amended May 29, 2020) ("While this order remains in effect, no filing fee will be required for a motion for an extension.").

If you have already sent the fee, it will be returned to you.

Thank you.

~~~~ CONFIDENTIALITY NOTICE ~~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.



**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 4<sup>th</sup> 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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NOV 03 2020  
SC Court of Appeals

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

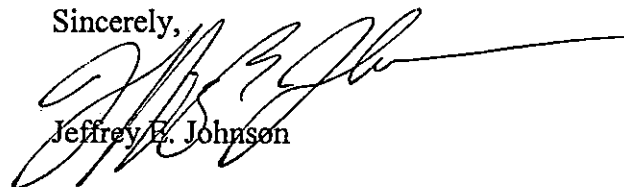
Dear Ms. Kitchings:

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

\$2.00  
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Jeff Johnson Atty at Law, LLC  
P.O. Drawer 1829  
Conway, SC 29528

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

