

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

RECEIVED
Nov 20 2020
SC Court of Appeals

Appellate Case No. 2020-000915
Case No. 2018-CP-08-01079

Latarsha Docena-
Guerrero,

Appellant,

v.

Rafael Docena-Guerrero,

Defendant

and

Government Employees
Insurance Company, as
underinsured motorist
insurance carrier,

Respondent.

APPELLANT'S MOTION FOR EXTENSION OF TIME TO SERVE REPLY BRIEF

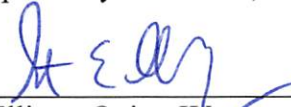
NOW COMES Appellant Latarsha Docena-Guerrero ("Appellant") by and through her undersigned counsel and respectfully moves the Court for an extension of time to and including December 2, 2020, to serve her Initial Reply Brief. In support thereof, Appellant shows the following:

1. On November 12, 2020, counsel for Appellant received Respondent's Brief.
2. On November 9, 2020, the wife of Elliotte Quinn, counsel for Appellant, gave birth to their third child and had unexpected complications arise from the delivery.

3. Counsel for Appellant needs additional time to prepare a Reply Brief.
4. Counsel for Appellant contacted counsel for Respondent regarding this request for an extension of time to file a Reply Brief, and counsel for Respondent consented to the requested extension, as reflected by the email correspondence attached hereto as Exhibit A.

WHEREFORE, Appellant Latarsha Docena-Guerrero respectfully moves the Court for an extension of time to and including December 2, 2020, to serve her Reply Brief.

Respectfully submitted,



F. Elliotte Quinn IV
Steven E. Goldberg
The Steinberg Law Firm, LLP
103 Grandview Drive
Summerville, SC 29483
(843) 871-6522

Attorneys for Appellant

November 20, 2020
Summerville, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appeal from Berkeley County
Court of Common Pleas
Roger C. Young, Circuit Court Judge

Appellate Case No. 2020-000915
Case No. 2018-CP-08-01079

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SC Court of Appeals

Latarsha Docena-
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Rafael Docena-Guerrero,

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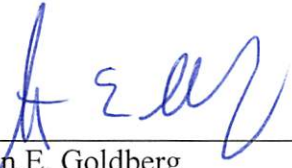
Respondent.

CERTIFICATE OF SERVICE

The undersigned certifies on November 20, 2020, he caused a copy of the foregoing Appellant's Motion for Extension of Time to Serve Reply Brief to be served on all parties of record by e-mail and by placing copies in the U.S. Mail, first class, postage prepaid, and addressed as follows:

Thomas H. Milligan
Milligan & Hems, PC
721 Long Point Road, Ste. 401
Mt. Pleasant, SC 29464
tom@milliganlawfirm.com

Jonathan S. Altman
Derfner & Altman, LLC
575 King Street, Ste. B
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jaltman@derfneraltman.com



Steven E. Goldberg
The Steinberg Law Firm, LLP
103 Grandview Drive, Ste. A
Summerville, SC 29484
(843) 871-6522

Exhibit A

Monica Correa

From: Tom Milligan <Tom@milliganlawfirm.com>
Sent: Wednesday, November 18, 2020 9:15 AM
To: Elliotte Quinn
Cc: Steven Goldberg; Monica Correa; Becky Chapin; Susan Broyles-Krohn
Subject: RE: Docena-Guerrero v. GEICO, Case No. 18-CP-08-1079

Of course. That's fine.

Congrats on the birth of your baby, and I hope that everyone is doing well now.

Tom Milligan

Thomas H. Milligan, Esquire
Peer Review Rated AV Preeminent
South Carolina Certified Mediator and Arbitrator

MILLIGAN  **HERNS**

721 Long Point Road, Suite 401
Mount, Pleasant, SC 29464
Phone: 843-971-6750
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Email: tom@milliganlawfirm.com

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From: Elliotte Quinn <equinn@steinberglawfirm.com>
Sent: Wednesday, November 18, 2020 9:13 AM
To: Tom Milligan <Tom@milliganlawfirm.com>
Cc: Steven Goldberg <sgoldberg@steinberglawfirm.com>; Monica Correa <mcorrea@steinberglawfirm.com>; Becky Chapin <bchapin@steinberglawfirm.com>
Subject: Docena-Guerrero v. GEICO, Case No. 18-CP-08-1079

Tom,

My office received your brief and designation of matter in this case on November 12, and it has not yet appeared in the Court of Appeal's C-Track docket. I was just now able to read through it because I have been out of the office due to my wife giving birth to our child and health complications my wife is experiencing from the delivery. I intend to move for an extension of the deadline for filing a reply brief. Will you please consent to an extension to December 2 for Appellant to file a reply brief?

Regards,
Elliotte Quinn

DAVID T. PEARLMAN
J. KEVIN HOLMES
THOMAS M. WHITE
MALCOLM M. CROSLAND, JR.
STEVEN E. GOLDBERG
MICHAEL J. JORDAN
BENJAMIN W. AKERY



CATHERINE D. MEEHAN
KELLY M. ALFREDS
F. ELLIOTTE QUINN IV
TAYLOR L. GROOMS
ANNIE E. ANDREES
CHARLES S. GOLDBERG (1933-2019)
HUGO M. SPITZ (1927-2018)
IRVING STEINBERG (1902-1980)

103 Grandview Dr. | P.O. Box 2670 | Summerville | SC | 29484 | (843) 871-6522 | (843) 871-8565 fax | steinberglawfirm.com

November 20, 2020

VIA U.S. MAIL AND E-MAIL

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
sspencer@sccourts.org
ctappfilings@sccourts.org

RECEIVED
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SC Court of Appeals

Re: Latarsha Docena-Guerrero vs. Rafael Docena-Guerrero
Case No. 2018-CP-08-01079
Appellate Case No. 2020-000915

Dear Hon. Clerk Kitchings,

Enclosed please Appellant's Motion for Extension of Time to Serve Reply Brief.

Regards


Steven E. Goldberg
sgoldberg@steinberglawfirm.com
843-871-6522

SEG/mbc

Enclosures (as stated)

November 20, 2020

Page 2

cc: (via U.S. mail and email)

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