

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 23 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

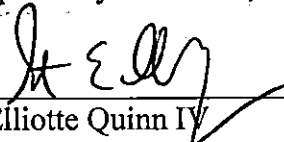
NOW COMES Appellant Latarsha Docena-Guerrero ("Appellant") by and through her undersigned counsel and respectfully moves the Court for an extension of time to and including December 2, 2020, to serve her Initial Reply Brief. In support thereof, Appellant shows the following:

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,



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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

# Exhibit A

## Monica Correa

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**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  
Fax: 843-971-6509  
Email: [tom@milliganlawfirm.com](mailto: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

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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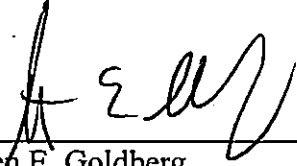
Respondent.

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  
Charleston, SC 29403  
jaltman@derfneraltman.com



---

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

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

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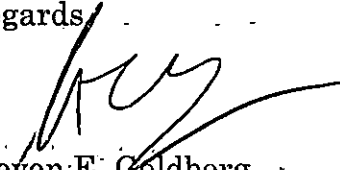
**SC Court of Appeals**

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)

Jonathan S. Altman  
Derfner & Altman, LLC  
575 King Street, Suite, B  
Charleston, SC 29403  
jaltman@derfneraltman.com

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

**STEINBERG**  
LAW FIRM | LLP

103 Grandview Drive | P.O. Box 2670  
Summerville, SC 29483

CHARLESTON SC 294

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**SC Court of Appeals**

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