

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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MAR 21 2013

S.C. Supreme Court

Appeal from Newberry County  
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge  
Civil Action No. 2008-CP-36-417

Appellate Case No. 2011-189987  
South Carolina Court of Appeals Unpublished Opinion No. 2013-UP-015  
Petition for Rehearing Denied February 22, 2013

Travelers Property Casualty Co.,

*Respt*  
Appellant,

v.

Senn Freight Lines, Inc.,

*Pet*  
Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE  
PETITION FOR WRIT OF CERTIORARI AND  
APPENDIX**


Pursuant to Rule 234 of the South Carolina Appellate Court Rules, the undersigned, as attorney for the Respondent, hereby moves for a 30-day extension of time (i.e., until April 24, 2013) in which to file the Petition for Writ of Certiorari and Appendix in the above-referenced case. The original deadline for said filing was March 25, 2013. The grounds for this motion are that the undersigned counsel and opposing counsel have engaged in discussions which have delayed the initial response by Respondent. As additional grounds, the undersigned has been involved in other matters, including numerous court

appearances, and a recent death in his close family has resulted in a backlog of work to be performed.

Accordingly, the undersigned hereby requests a thirty (30) day extension until April 24, 2013 to file the Petition for Writ of Certiorari and Appendix. Counsel for Appellants has been consulted and has graciously consented to said extension of time.

Respectfully Submitted,

By:



W. Chad Jenkins, Esquire  
POPE AND HUDGENS, P.A.  
1508 College Street  
Post Office Box 190  
Newberry, SC 29108  
Tel: (803) 276-2532  
Fax: (803) 276-8684  
cjenkins@popeandhudgens.com

ATTORNEYS FOR RESPONDENT  
SENN FREIGHT LINES, INC.

Newberry, South Carolina  
March 20, 2013

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IN THE SUPREME COURT

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**PROOF OF SERVICE**

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The undersigned employee of Pope & Hudgens, P.A., Attorneys at Law, Post Office Box 190, 1508 College Street, Newberry, South Carolina 29108, does hereby certify that she has served the following named individual(s) with a copy of the pleading(s) indicated below by mailing a copy of same in the United States mail, with sufficient postage affixed thereto and return address clearly marked on the 21st Day of March, 2013:

**COUNSEL SERVED:**

M. Dawes Cooke, Jr., Esquire  
Barnwell Whaley Paterson & Helms, LLC  
PO Drawer H  
Charleston, SC 29402

**PLEADING SERVED:**

Motion for Extension of Time to File Petition for Certiorari and Appendix

  
Katherine Barnett

March 21, 2013