

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Charles B. Simmons, Jr., Master-in-Equity

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Appellate Case No. 2020-000669  
Case No. 2016-CP-23-5905

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**RECEIVED**  
**Dec 08 2020**  
**SC Court of Appeals**

Renewable Water Resources,..... Respondent,

v.

Insurance Reserve Fund, a Division of the  
State Fiscal Accountability Authority of South Carolina,..... Appellant.

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**MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANT’S INITIAL REPLY BRIEF**

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The Appellant Insurance Reserve Fund respectfully moves this Court for an additional seven-day extension of time until December 17, 2020, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

The Appellant’s motion is based on the following grounds:

1. The Appellant's Initial Reply Brief is currently due to be filed and served on December 10, 2020.

2. The undersigned counsel requires additional time to complete the Appellant's Initial Reply Brief because the undersigned counsel has had numerous other obligations and deadlines that will prevent him from completing the Appellant's Initial Reply Brief by the current deadline. In addition, the undersigned counsel, Andrew Lindemann, was in trial in Aiken County during the week of November 30, 2020. The time spent in trial and the preparation time prior to trial have necessitated this request for an additional seven-day extension. That time is needed to respond to a 49-page brief and to properly coordinate the reply arguments with co-counsel.

3. The undersigned has consulted with William Brown, counsel for the Respondent, and he consented to the requested extension by email (copy attached).

WHEREFORE, the Appellant respectfully requests that it be allowed until December 17, 2020, by which to file and serve its Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann

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-and-

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*Counsel for Defendant South Carolina  
Insurance Reserve Fund*

December 8, 2020

## Andrew Lindemann

---

**From:** William Brown <william.brown@nelsonmullins.com>  
**Sent:** Tuesday, December 8, 2020 9:44 AM  
**To:** Andrew Lindemann; Rivers Stilwell; Miles Coleman  
**Cc:** John Devlin  
**Subject:** RE: ReWa v. IRF

**Importance:** Low

Andrew,

We are fine with your requesting the additional 7 day extension, until December 17<sup>th</sup>.

William

**From:** Andrew Lindemann <Andrew@ldlawsc.com>  
**Sent:** Tuesday, December 8, 2020 9:01 AM  
**To:** William Brown <william.brown@nelsonmullins.com>; Rivers Stilwell <rivers.stilwell@nelsonmullins.com>; Miles Coleman <Miles.Coleman@nelsonmullins.com>  
**Cc:** John Devlin <john.devlin@devlawsc.com>  
**Subject:** ReWa v. IRF  
**Importance:** High

◀External Email▶ - From: [Andrew@ldlawsc.com](mailto:Andrew@ldlawsc.com)

William, Rivers and Miles:

My initial reply brief is due on December 10<sup>th</sup>. I was in trial last week in Aiken County. That, together with trial prep, has put me behind. Will you kindly consent to an additional 7 day extension through December 17<sup>th</sup>? I would greatly appreciate the courtesy.

Thanks.

Andrew

Nelson Mullins is continuing to monitor developments related to COVID-19, including guidance from the Centers for Disease Control and various health officials; and federal, state, and local government authorities. The firm has implemented precautionary measures and plans to ensure the continuation of all firm services to clients from both in office and remote work arrangements across our 25 geographically disperse offices. [Click here to visit the Nelson Mullins Coronavirus Resources page](#). Information described therein is subject to change.

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RECEIVED

Dec 08 2020

SC Court of Appeals

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CERTIFICATE OF SERVICE

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Pursuant to Section (g)(3) of the Supreme Court's Order Re: Operation of the Trial Courts During the Coronavirus Emergency (as amended May 29, 2020), the undersigned employee of Lindemann & Davis, P.A., counsel for the Appellant, does hereby certify that service of the **Motion for Extension of Time to File Appellant's Initial Reply Brief** was made upon all counsel of record by email only this the 8th day of December 2020:

John R. Devlin, Jr., Esquire  
Devlin & Parkinson, P.A.  
Email: [john.devlin@devlinparkinson.com](mailto:john.devlin@devlinparkinson.com)

Rivers S. Stilwell, Esquire  
William S. Brown, V, Esquire  
Katie E. Towery, Esquire  
Nelson Mullins Riley & Scarborough, LLP  
Email: [rivers.stilwell@nelsonmullins.com](mailto:rivers.stilwell@nelsonmullins.com)  
Email: [william.brown@nelsonmullins.com](mailto:william.brown@nelsonmullins.com)  
Email: [katie.towery@nelsonmullins.com](mailto:katie.towery@nelsonmullins.com)

*s/ Andrew F. Lindemann*

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\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
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December 8, 2020

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RECEIVED**  
**Dec 08 2020**  
**SC Court of Appeals**

RE: Renewable Water Resources v. Insurance Reserve Fund, a Division of the State Fiscal  
Accountability Authority of South Carolina  
Appellate Case Number: 2020-000669  
Civil Action Number: 2016-CP-23-5905  
Claim Number: A4190  
Our File Number: 104.10068

Dear Ms. Kitching:

In accordance with Section (c)(5) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020), please find enclosed for filing the **Motion for Extension of Time to File Appellant's Initial Reply Brief** in the above referenced matter. In accordance with Section (g)(3) of this same order, I am hereby serving copies on all counsel of record by email only. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosure

cc: Rivers S. Stilwell, Esquire (w/ Enclosure, Via Email Only)  
William S. Brown, V, Esquire (w/ Enclosure, Via Email Only)  
Katie E. Towery, Esquire (w/ Enclosure, Via Email Only)  
John R. Devlin, Jr., Esquire (w/ Enclosure, Via Email Only)