

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

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Case No. 2020-CP-40-01226

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**RECEIVED**

**Dec 17 2020**

**SC Court of Appeals**

Covil Corporation, by and  
through its duly appointed  
Receiver, Peter D. Protopapas,

Respondent,

v.

Pennsylvania National Mutual  
Casualty Insurance Company,

Appellant.

Appellate Case No. 2020-001239

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**MOTION TO EXTEND TIME TO FILE APPELLANT BRIEF**

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Pennsylvania National Mutual Casualty Insurance Company (“Penn National”), by and through counsel, and pursuant to the South Carolina Rules of Appellate Procedure, Rule 208(a)(1) and Rule 240, moves the Court for permission to extend time to file the Reply Brief of Appellant, and shows the Court as follows:

1. Penn National filed a Notice of Appeal on September 14, 2020 appealing from an Order of the Honorable Jean H. Toal entered on August 13, 2020.
2. Penn National filed its initial Appellant Brief on November 13, 2020.
3. Respondent filed its initial Brief on December 14, 2020.
4. Penn National’s Reply is due on December 24, 2020.

5. Penn National respectfully requests an additional fourteen (14) days, through January 7, 2021, to file and serve its Reply Brief.

6. Counsel for Penn National has conferred with counsel for Plaintiff/Respondent, and counsel for Plaintiff/Respondent consents to Penn National's request for additional time.

December 17, 2020.

/s/ David G. Harris II

David G. Harris II

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*Attorneys for Respondent*

**NOTICE OF APPEAL IN A CIVIL CASE**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

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**SC Court of Appeals**

Covil Corporation, by and  
through its duly appointed  
Receiver, Peter D. Protopapas, Respondent,

v.

Pennsylvania National Mutual Appellant.  
Casualty Insurance Company,

Appellate Case No. 2020-001239

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**PROOF OF SERVICE**

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I certify that a true copy of the Motion to Extend Time to File Reply Brief of Appellant in this case has been served on the following, this 17<sup>th</sup> day of December, 2020, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to subsection (g)(3) of the South Carolina Supreme Court's March 20, 2020 Order, as amended May 29, 2020 to the following counsel of record:

[jspitz@rplegalgroup.com](mailto:jspitz@rplegalgroup.com)

[murrell@smithrobinsonlaw.com](mailto:murrell@smithrobinsonlaw.com)  
[jon@smithrobinsonlaw.com](mailto:jon@smithrobinsonlaw.com)

December 17, 2020.

/s/ David G. Harris II

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*Attorney for Appellant Pennsylvania National  
Mutual Casualty Insurance Company*

September 14, 2020

**Via Email**

Honorable Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED****Dec 17 2020****SC Court of Appeals**

Re: ***Covil Corporation, by and through its duly appointed Receiver, Peter D. Protopapas v. Pennsylvania National Mutual Casualty Insurance Company Richland County, SC – Case No: 2020-CP-40-01226 SC Appellate Case No. 2020-001239***

Dear Ms. Kitchings:

I am enclosing Pennsylvania National Mutual Casualty Insurance Company's Motion to Extend Time to File the Reply Brief of Appellant and the Proof of Service for filing in the above-referenced matter.

Please let me know if you have any questions.

With kindest regards, I am

Sincerely,

**GOLDBERG SEGALLA LLP**

*Dale R. Smith*

Dale R. Smith, NCCP  
Paralegal to David G. Harris II

/drs

Enclosures (*via Email*)

cc: Jescelyn Tillman Spitz, Esq. (*w/encls via Email*)  
G. Murrell Smith, Jr., Esq. (*w/ encls via Email*)  
Jonathan M. Robinson, Esq. (*w/encls via Email*)