

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM Horry COUNTY  
Court of Common Pleas

The Honorable Clifton B. Newman  
Circuit Court Judge

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Case No.: 2016-CP-26-05356  
Appellate Case No.: 2020-001245

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**RECEIVED**  
**Jan 05 2021**  
**SC Court of Appeals**

Progressive Northern Insurance Co., ..... Respondent,  
v.  
Brandon Lawrence and Ashley Outlaw, ..... Defendants,  
of whom Brandon Lawrence is the Appellant and Ashley Outlaw is a Respondent.

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**MOTION FOR EXTENSION TO FILE AND SERVE INITIAL BRIEF, DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, AND PROOF OF SERVICE THEREOF AND TO HOLD FILING DEADLINES IN ABEYANCE UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION ON THE MERITS**

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Respondent Progressive Northern Insurance Company hereby moves for an extension of time for filing its Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof on the Appellant in the above-captioned case. To date, Respondent has not requested an extension of time for any filing. Due to the press of counsel's caseload; the interruption of the Christmas and New Year's holidays; the probable, imminent diagnosis of counsel's wife with Covid-19 (in that she is exhibiting the classic symptoms); and the nature and extent of the issues to be discussed in the Initial Brief, counsel for Respondent needs additional time to complete the Initial Brief and Designation of Matter to be Included in the Record on Appeal. Undersigned counsel therefore requests a thirty-day extension of time such that the Initial Brief, Designation of Matter to be Included in the Record on Appeal and Proof of Service of thereof

would be due on Friday, February 12, 2021. While this motion is pending, Respondent requests that all filing deadlines be held in abeyance until the Court issues an order deciding this motion on the merits. Respondent's counsel has conferred with counsel for Appellant, who has graciously consented to the extension of time requested herein.

By: s/William Pearce Davis  
William Pearce Davis  
SC Bar No.: 1585  
Baker Ravenel & Bender, LLP  
3710 Landmark Drive, Suite 400  
Post Office Box 8057  
Columbia, SC 29202  
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*Attorney for Respondent Progressive Northern  
Insurance Company*

January 5, 2021  
Columbia, SC

Other Counsel of Record:

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P.O. Drawer 1829  
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*Attorneys of Record for Appellant*

THE STATE OF SOUTH CAROLINA  
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of whom Brandon Lawrence is the Appellant and Ashley Outlaw is a Respondent.

**PROOF OF SERVICE**

I, Suzanne Rodriguez, Legal Assistant to William P. Davis, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for Progressive Northern Insurance Company, Respondent, hereby certify that I have, on this 5<sup>th</sup> day of January, 2021, served a Motion for Extension to File and Serve Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel of record at the following address:

Jeffrey E. Johnson  
P.O. Drawer 1829  
Conway, SC 29528-1829

William V. Josephs, III  
Josephs Law Firm  
4009 Meeting Street  
Loris, SC 29569

  
Suzanne Rodriguez



# BAKER RAVENEL BENDER

ATTORNEYS AT LAW

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(803) 343-3865 – direct dial

January 5, 2021

VIA EMAIL [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Jan 05 2021**  
**SC Court of Appeals**

Re: Progressive Northern Insurance Co., Respondent v. Brandon Lawrence and Ashley  
Outlaw, Appellant  
Appellate Case No.: 2020-001245  
Our File No.: 10716.80

Dear Ms. Kitchings:

Attached please find for filing Respondent's Motion for an Extension to File the Initial Brief, the Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof on Appellant's counsel.

By copy hereof, I am serving same upon counsel of record.

Thank you very much.

Sincerely yours,

*s/William P. Davis*

William P. Davis

WPD:sr

Enclosure

cc w/encl.: Jeffrey E. Johnson E-Mail [firm@jjohnsonlaw.net](mailto:firm@jjohnsonlaw.net) and U.S. Mail  
William V. Josephs, III E-Mail [trey@josephslawfirm.com](mailto:trey@josephslawfirm.com) and U.S. Mail