

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

The Honorable Clifton B. Newman
Circuit Court Judge

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

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.

**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**

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
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*Attorney for Respondent Progressive Northern
Insurance Company*

January 5, 2021
Columbia, SC

Other Counsel of Record:

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Attorneys of Record for Appellant

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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 5th 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



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ATTORNEYS AT LAW

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(803) 343-3865 – direct dial

January 5, 2021

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

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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 and U.S. Mail
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