

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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**RECEIVED**

**Feb 23 2021**

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Clifton B. Newman, Circuit Court Judge

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Case No. 2016-CP-26-05356  
(Court of Appeals Case No. 2020-001245)

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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 OF TIME TO FILE  
THE RECORD ON APPEAL AND TO HOLD FILING DEADLINES IN ABEYANCE  
UNTIL THE COURT ISSUES AN ORDER DECIDING THE MOTION ON THE  
MERITS**

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Appellant moves, pursuant to Rules 240 and 263(b), SCACR, before this Honorable Court for a thirty (30) day extension of time to file the Record on Appeal. The Record on Appeal is presently due on March 12, 2021. The parties are in the process of exchanging documentation to be placed in the Record on Appeal and need additional time for same. The undersigned counsel therefore, requests a thirty (30) day extension of time such that the Record on Appeal would be due on April 12, 2021.

While this motion is pending, Appellant requests that all filing deadlines be held in abeyance until the Court issues an Order deciding this motion on the merits.

Appellant's counsel has conferred with counsel for Respondent Progressive Northern Insurance Co., and has consented to the extension of time requested herein.

February 23, 2021

s/Jeffrey E. Johnson  
Jeffrey E. Johnson  
P.O. Drawer 1829  
Conway, SC 29528-1829  
Phone: (843) 488-5333  
S.C. Bar No. 16835

AND

William V. Josephs, III  
Josephs Law Firm  
4009 Meeting Street  
Loris, SC 29569  
Phone: (843) 756-7464  
S.C. Bar No. 13464  
Attorneys for Appellant

Other Counsel of Record/Respondent:

William P. Davis  
Baker, Ravenel & Bender LLP  
P.O. Box 8057  
Columbia, SC 29202  
Phone: (803) 799-9091  
S.C. Bar No. 1585  
Attorney for Respondent Progressive

Ashley Outlaw  
2824 Bethune Highway  
Bishopville, SC 29010  
Respondent

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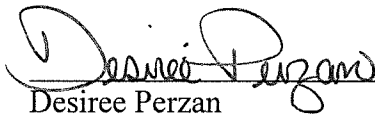
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**PROOF OF SERVICE**

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I certify that I have served the Motion for Extension of Time to File the Record on Appeal and Hold Filing Deadlines in Abeyance Until the Court issues an Order Deciding the Motion on the Merits on the Respondents by depositing a copy of it in the United States Mail, postage prepaid, on February 23, 2021, addressed to its attorney of record William P. Davis of Baker Ravenel & Bender, LLP, P.O. Box 8057, Columbia, South Carolina 29202 and Respondent Ashley Outlaw, 2824 Bethune Highway, Bishopville, SC 29010.

February 23, 2021



Desiree Perzan  
Paralegal to Jeffrey E. Johnson  
P.O. Drawer 1829  
Conway, SC 29528  
(843) 488-5333



**JEFF JOHNSON**  
ATTORNEY AT LAW, LLC  
1409 Second Avenue  
Conway, South Carolina 29526

Reply to: P.O. Drawer 1829  
Conway, SC 29528

S.C. Certified Civil Court Mediator

ADMITTED:  
United States Supreme Court  
South Carolina Supreme Court  
United States Court of Appeals 4<sup>th</sup> Circuit  
United States District Court District of South Carolina

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EMAIL: firm@jjohnsonlaw.net

February 23, 2021

VIA EMAIL: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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**Feb 23 2021**

**SC Court of Appeals**

*RE:* Progressive Northern Insurance Co. v. Brandon Lawrence  
Appellate Case Number: 2020-001245

Dear Ms. Kitchings:

Attached please find for filing, Appellant's Motion for Extension of Time to File the Record on Appeal and to Hold Filing Deadlines in Abeyance Until the Court Issues an Order Deciding the Motion on the Merits.

It is my understanding that due to the current pandemic, the Court of Appeals is not accepting filing fees for motions for extension requests at this time.

By copy of this correspondence, I am serving same upon all Counsel and parties of record.

Sincerely,

Jeffrey E. Johnson

JEJ/dp  
Enclosures

cc: William P. Davis, Esq.  
Ashley Outlaw  
William V. Josephs III, Esq.  
Client