

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jean H. Toal
Acting Circuit Court Judge

Appellate Case No. 2021-000462
Circuit Court Case No. 2019-CP-40-03003

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Jun 10 2021

S.C. SUPREME COURT

Ann Finch, Individually and as Executor of the Estate of Franklin Finch;
and Peter D. Protopapas, as Court-Appointed Receiver for Covil
Corporation, Respondents,

v.

United States Fidelity and Guaranty Company; Zurich American Insurance
Company; and Wall, Templeton & Haldrup, P.A., Defendants,

Of Which

United States Fidelity and Guaranty Company is the Petitioner.

USF&G’S MOTION FOR EXTENSION OF TIME TO RESPOND TO THE “MOTION FOR
LIMITED REMAND”

On May 3, 2021, Petitioner USF&G filed a Petition for a Writ of Certiorari with this Court that seeks review of a decision by the Court of Appeals dismissing this case as not being immediately appealable, a decision that was contrary to a uniform body of case and constitutional law that requires mode-of-trial rulings to be immediately appealed.

Rather than oppose the petition, on June 1, 2021, Respondents filed a motion entitled “Motion for Limited Remand,” which asked this Court to stay USF&G’s petition and remand this case back to the circuit court for “consideration of motions by Respondents.” Whatever motions

the Respondents are referencing in their submission to this Court have not been filed below or provided to USF&G.

USF&G's deadline for responding to the "Motion for Limited Remand" is June 11, 2021. Because of the press of prior out-of-state trial commitments that run concurrently with USF&G's existing deadline, and because USF&G has not yet had the opportunity to even review the motions that Respondents allegedly may file below in order to fully respond to the "Motion for Limited Remand," USF&G respectfully moves for an order extending its deadline to respond to the Respondents' motion by ten days, which would make its new response deadline June 21, 2021. Likewise, USF&G respectfully requests that the Court hold the pending deadline in abeyance while it considers this motion.

Signature Page Attached

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: /s/ M. Todd Carroll

S.C. Bar No. 74000

todd.carroll@wbd-us.com

M. Elizabeth O'Neill

S.C. Bar No. 104013

elizabeth.oneill@wbd-us.com

1221 Main Street, Suite 1600

Columbia, SC 29201

(803) 454-6504

SIMPSON THACHER & BARTLETT LLP

Andrew T. Frankel (*admitted pro hac vice*)

afrankel@stblaw.com

Mary Beth Forshaw (*admitted pro hac vice*)

mforshaw@stblaw.com

Alan Turner (*admitted pro hac vice*)

aturner@stblaw.com

Michael S. Carnevale (*admitted pro hac vice*)

michael.carnevale@stblaw.com

425 Lexington Avenue

New York, NY 10017

(212) 455-3073

Attorneys for Appellant United States Fidelity and
Guaranty Company

June 10, 2021