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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jean H. Toal
Acting Circuit Court Judge

C.A. No: 2019-CP-40-06243
Appellate Case No. 2021-000648

Peter D. Protopapas, as Receiver for Starr Davis Company, Inc. and Starr Davis
Company of S.C., Inc..... Respondents,

v.

Travelers Casualty and Surety Company f/k/a The Aetna Casualty and Surety Company;
The Standard Fire Insurance Company; St. Paul Fire and Marine Insurance Company;
The Employers' Fire Insurance Company; Southeastern Agency Group and M.I.A.
Company, Inc. individually and as successors to or f/k/a Merrimon Insurance Agency,
Inc.; Robert E. Aspray; Nell Ashworth, individually and as personal representative of the
Estate of Robert J. Ashworth; Betty C. D'Amico, individually and as Executor of the
Estate of Julian D'Amico, Jr.; Kayla Keith, individually and as the personal
representative of the Estate of Jerry W. Archer, Sr.; Richard L. Knight II, as personal
representative of the Estate of Teddy L. Knight, Sr., and Linda Knight, individually;
David D. Rollins; James W. Smith and Frances R. Smith; and Linda J. White,
individually and as personal representative of the Estate of Lubert R. White, Jr.,..... Defendants,

Of which

Travelers Casualty and Surety Company f/k/a The Aetna Casualty and Surety Company
and The Standard Fire Insurance Company are the Appellants.

CONSENT MOTION TO EXTEND DEADLINE FOR FILING REPLY BRIEF

Pursuant to Rule 240, SCACR, Appellants move for an order extending their deadline for
filing and serving their reply brief by twenty days. The current deadline is October 28, 2021. If
granted, the new deadline would be November 17, 2021. Appellants request this extension so that

they have sufficient time to properly address the myriad issues presented in this appeal. Appellants further state that they consulted with counsel for the Respondents, and the Respondents consent to the requested extension.

Accordingly, Appellants respectfully request that the Court extending their deadline for filing their reply brief to November 17, 2021.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

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Attorneys for Appellants Travelers Casualty
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Insurance Company

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PROOF OF SERVICE

I, the undersigned of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Appellants, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specified below by emailing them as the addresses below:

Pleading(s): Consent Motion to Extend Deadline for Filing Reply Brief

Parties Served:

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Counsel for the Respondents

By: /s/ M. Todd Carroll

October 19, 2021



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Via Electronic Filing

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: Protopapas, as Receiver for Starr Davis Company v. Travelers Casualty and
Surety Company
Appellate Case No. 2021-000648
Consent Request for Extension for Filing Reply Brief

Dear Ms. Kitchings:

Please find attached for filing with the Court a consent motion to extend the Appellants' deadline to file their reply brief. We are e-filing this letter pursuant to Section (b)(2) of Supreme Court Order 2021-08-25-02, and we are also serving this letter via email on counsel for the Respondents, as permitted by Section (d)(1) of that Order.

Pursuant to Section (c) of that Order, we shall mail the filing fee that accompanies this request within five days of this filing.

We appreciate the Court's consideration of this request. If we can provide any additional materials or information, please do not hesitate to call on us.

Best regards,

/s/ M. Todd Carroll

cc: Counsel for Respondents