

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

**Nov 23 2021**  
S.C. SUPREME COURT

Jocelyn Newman, Circuit Judge

Appellate Case No. 2021-000005

Stephany A. Connelly and James M. Connelly,.....Plaintiffs

v.

The Main Street America Group, Old Dominion Insurance Company, Allstate Fire and Casualty Insurance Company, Debbie Cohn, and Freya Trezona, .....Defendants

Of which Allstate Fire and Casualty Insurance Company, The Main Street America Group and Old Dominion Insurance Company are the.....Petitioners

And

Stephany A. Connelly and James M. Connelly are the.....Respondents

**THE PETITIONERS**  
**The Main Street America Group and Old Dominion Insurance Company's**

**MOTION FOR EXTENSION OF TIME TO FILE A REPLY BRIEF**

The petitioners The Main Street America Group and Old Dominion Insurance Company, through their undesignated counsel and in accordance with Rule 263(b), SCACR, move this court for a 20-day extension for filing the petitioners' brief in reply to the Respondents' brief.

This motion is made on the following grounds:

The Respondents filed and served their brief on November 18, 2021, thus setting a deadline—pursuant to Rules 242(i) and 263(a), SCACR—of November 29, 2021, for filing the

petitioners' reply brief. This 11-day period happens to coincide with the Thanksgiving holidays. It also coincides with the time for preparation, on the part of the attorneys for these petitioners, for a trial in the Richland County Court of Common Pleas, which is set to start on November 29, 2021—the current due date for the reply brief.

**WHEREFORE**, the petitioners The Main Street America Group and Old Dominion Insurance Company hereby kindly ask this Court for a 20-day extension to file their reply brief. If granted, the extension would set a new deadline of December 18, 2021.

Respectfully submitted,



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Attorneys for the Petitioners  
The Main Street America Group and  
Old Dominion Insurance Company

November 23, 2021  
Columbia, South Carolina

**CERTIFICATE OF SERVICE**  
Appellate Case No. 2021-000005

I certify that on November 23, 2021, I have served the petitioners The Main Street America Group and Old Dominion Insurance Company's Motion for Extension of Time by electronic mail—in accordance with this Court's August 25, 2021 Order re: Methods of Electronic Filing and Service under Rule 262 of the South Carolina Appellate Court Rules, Appellate Case No. 2020-000447 at § (d)(1)—on counsel for the respondents Stephany A. Connelly and James M. Connelly, sent to their AIS-registered email addresses, as follows: John D. Kassel, Esq., jkassel@kassellaw.com; Theile B. McVey, Esq., tmcvey@kassellaw.com; Bert Glenn Utsey, III, bert@cfulaw.com; and counsel for the petitioner Allstate Fire and Casualty Insurance Company: A. Johnston Cox, Esq., jcox@gwblawfirm.com; Kendall Crawford, Esq., kcrawford@gwblawfirm.com.



**From:** [Michal Kalwajtys](mailto:Michal.Kalwajtys@kassellaw.com)  
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**Cc:** [Thomas Dougall](mailto:Thomas.Dougall@kassellaw.com)  
**Subject:** Service of MSA/Old Dominion's Motion for Extension for Time to File a Reply Brief--Connely v. Main Street America, et al.--Appellate Case No. 2021-000005  
**Date:** Tuesday, November 23, 2021 1:08:00 PM  
**Attachments:** [Motion for Extension of Time.pdf](#)

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Counselors:

Attached please find a PDF with Petitioners the Main Street America Group and Old Dominion Insurance Company's Motion for Extension of Time for Filing a Reply Brief in the above matter, being served upon you as the attorneys of record, in accordance with § (d)(1) of the Supreme Court's August 25, 2021, Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, Appellate Case No. 2020-000447.

Best regards,

Michal Kalwajtys  
Associate  
Attorney

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