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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 REPLY BRIEF

Pursuant to Rule 240, SCACR, Appellants move, with consent of the Respondents, to extend the deadline for filing their initial reply to January 11, 2022. This deadline has previously been extended once, but has been stayed due to a disagreement among the parties regarding the contents of the record on appeal. The parties have now resolved that disagreement, and the Appellants respectfully move to have the deadline for filing their reply re-set to January 11, 2022, to account for holiday schedules. As indicated above, prior to filing this motion, the Appellants consulted with the Respondents regarding this motion, and the Respondents consent to the relief sought herein.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

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Attorneys for Appellants Travelers Casualty
and Surety Company and The Standard Fire
Insurance Company

December 15, 2021

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 Reply Brief

Parties Served:

Brian M. Barnwell (bb@rplegalgroup.com)
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Counsel for the Respondents

By: /s/ M. Todd Carroll

December 15, 2021



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December 15, 2021

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

Dear Ms. Kitchings:

Please find attached for filing two documents: (1) a Notice of Withdrawal of Motion to Strike, and (2) a Consent Motion to Extend Deadline for Reply Brief. We are e-filing this motion pursuant to Section (b)(1) of Supreme Court Order 2021-08-25-02, and we are also serving this motion 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 these filings. 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