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Jan 18 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

Case No. 2020-CP-40-01226

Covil Corporation, by and
through its duly appointed
Receiver, Peter D. Protopapas, Respondent,

v.

Pennsylvania National Mutual
Casualty Insurance Company, Appellant.

Appellate Case No. 2020-001239

MOTION TO EXTEND TIME TO FILE PETITION FOR REHEARING

Pennsylvania National Mutual Casualty Insurance Company (“Penn National”), by and through counsel, and pursuant to the South Carolina Rules of Appellate Procedure, Rule 221(a) and Rule 240, moves the Court for permission to extend time to file its Petition for Rehearing, and shows the Court as follows:

1. Penn National filed a Notice of Appeal on September 14, 2020 appealing from an Order of the Honorable Jean H. Toal entered on August 13, 2020.
2. The parties fully briefed and argued the appeal and the Court issued its opinion on January 5, 2022, affirming the trial court’s grant of partial summary judgment.
3. Penn National’s Petition for Rehearing is due on January 20, 2022, fifteen (15) days after the filing of the Court’s opinion, pursuant to Rule 221(a).

4. On January 16, 2022, Winter Storm Izzy significantly impacted the Carolinas, including the area where undersigned counsel is located.

5. As of January 18, 2022, conditions have continued to make travel hazardous in the area and limited the access of undersigned counsel and staff to their offices.

6. Additionally, potentially significant winter weather has been forecast to begin in the area again on Thursday, January 20, 2022. While Penn National and its undersigned counsel can have no way of knowing what, if any, impact this weather may have on the area, as of today it is forecast to arrive the same day that Penn National's Petition for Rehearing is due.

7. Based on the foregoing, Penn National respectfully requests an additional seven (7) days, through January 27, 2022, to file and serve its Petition for Rehearing.

8. This is Penn National's first request for an extension.

9. Counsel for Penn National has conferred with counsel for Plaintiff/Respondent, and counsel for Plaintiff/Respondent consents to Penn National's request for additional time.

January 18, 2022.

/s/ David G. Harris II
David G. Harris II
dharris@goldbergsegalla.com
S.C. State Bar No. 101951
Brady A. Yntema (*Admitted pro hac vice*)
byntema@goldbergsegalla.com
N.C. State Bar No. 25771
GOLDBERG SEGALLA LLP
701 Green Valley Road, Suite 310
Greensboro, North Carolina 27408
Telephone: (336) 419-4900
*Attorney for Appellant Pennsylvania
National Mutual Casualty Insurance Co.*

Other Counsel of Record

Jescelyn Tillman Spitz
jspitz@rplegalgroup.com
RIKARD & PROTOPAPAS, LLC
1329 Blanding Street
Columbia, South Carolina 29201
Telephone: (803) 978-6111

-and-

G. Murrell Smith, Jr.

murrell@smithrobinsonlaw.com

Jonathan M. Robinson

jon@smithrobinsonlaw.com

SMITH ROBINSON HOLLER

DUBOSE AND MORGAN, LLC

2725 Devine Street

Columbia, South Carolina 29205

Telephone: (803) 254-5445

Attorneys for Respondent

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Receiver, Peter D. Protopapas,

Respondent,

v.

Pennsylvania National Mutual
Casualty Insurance Company,

Appellant.

Appellate Case No. 2020-001239

PROOF OF SERVICE

I hereby certify that a copy of the foregoing Appellant's Motion to Extend Time to File
Petition for Rehearing was served on all counsel of record by electronic mail as follows:

Jescelyn Tillman Spitz, Esq.
RICKARD & PROTOPAPAS, LLC
1329 Blanding Street
PO Box 5640 (29250)
Columbia, South Carolina 29201
jspitz@rplegalgroup.com

G. Murrell Smith, Jr.
Jonathan M. Robinson
SMITH ROBINSON HOLLER DUBOSE AND MORGAN, LLC
2725 Devine Street
Columbia, SC 29205
Telephone: 803-254-5445
murrell@smithrobinsonlaw.com
jon@smithrobinsonlaw.com
Attorneys for Respondent Covil Corporation

This the 18th day of January, 2022.

/s/ David G. Harris II
David G. Harris II
S.C. State Bar No. 101951
Brady A. Yntema (*Admitted Pro Hac Vice*)
David L. Brown
GOLDBERG SEGALLA LLP
701 Green Valley Road, Suite 310
Greensboro, NC 27408
(336) 419-4900
*Attorneys for Appellant Pennsylvania
National Mutual Casualty Insurance
Company*