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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

CERTIFIED QUESTIONS FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Mary Geiger Lewis, United States District Court Judge

Appellate Case No. 2021-001209
District Court Case No. 3:20-cv-02275

Sullivan Management, LLC,

Plaintiff,

v.

Fireman's Fund Insurance Company,
and Allianz GLOBAL Risks US
Insurance Company,

Defendants.

CONSENT MOTION FOR PERMISSION TO EXCEED REPLY PAGE LIMIT

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Pursuant to the South Carolina Appellate Court Rules (“SCAR”), Plaintiff Sullivan Management, LLC (“Sullivan”), with the consent of Defendants Fireman’s Fund Insurance Company, and Allianz GLOBAL Risks US Insurance Company, respectfully moves for an Order permitting Plaintiff to file a Reply in excess of 25 pages.

Counsel for Plaintiff requests that the Court permit it to file a 35-page Reply in response to Defendants’ Brief. The additional 10 pages are needed because of the depth, complexity, and range of issues presented by the certified questions here.

A check for the \$50.00 filing fee associated with this Motion is enclosed.

Respectfully submitted,

JUSTIN O’TOOLE LUCEY, P.A.

By: /s/ Justin Lucey_____

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February 18, 2022

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[Signatures continue on next page.]

We so consent:

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