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Mar 09 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Clifton B. Newman
Circuit Court Judge

Appellate Case No.: 2020-001245
Case No.: 2016-CP-26-05356

Progressive Northern Insurance Co., Respondent,

v.

Brandon Lawrence and Ashley Outlaw, Defendants,

Of whom Brandon Lawrence is the Appellant and Progressive Northern Insurance Co. is a
Respondent.

MOTION FOR PROTECTION

Pursuant to the South Carolina Appellate Court rules, including 240 and 267, counsel for the Respondent moves before the Court on the request of Mariel D. Norton, Esquire (SC Bar No.: 100198) of Baker, Ravenel & Bender, LLP in Columbia, South Carolina, for protection from court appearance from April 15, 2022 through August 15, 2022, as she will be out on anticipated maternity leave.

Final briefing has been completed in this case, and undersigned counsel respectfully notifies the Court of her upcoming maternity leave and requests protection during the above dates.



Mariel D. Norton (S.C. Bar No.: 100198)
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax: (803) 779-3423
File No.: 10716.80
*Attorneys for Respondent Progressive Northern
Insurance Co.*

Columbia, South Carolina
March 9, 2022

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Respondent.

PROOF OF SERVICE

I, Suzanne Rodriguez, Legal Assistant of Baker, Ravenel & Bender, LLP, hereby certify that, on this 9th day of March 2022, have served the Motion for Protection of Mariel D. Norton via electronic mail and by U.S. Mail to Appellant's counsel of record and Respondent Ashley Outlaw at the addresses shown below:

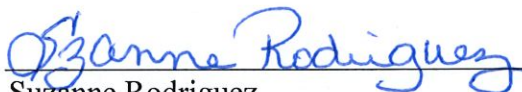
Jeffrey E. Johnson, Esquire
Jeffrey E. Johnson, Attorney at Law, LLC
P.O. Drawer 1829
Conway, SC 29528-1829
firm@jjohnsonlaw.net

Ashley S. Outlaw
2824 Bethune Highway
Bishopville, SC 29010
Ashleysmith_21@yahoo.com
Defendant

AND

William V. Josephs, III, Esquire
Josephs Law Firm
4009 Meeting Street
Loris, SC 29569
trey@josephslawfirm.com

Attorneys for Appellant



Suzanne Rodriguez
Legal Assistant to Mariel D. Norton
SC Bar No.: 100198
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Columbia, South Carolina
March 9, 2022



BAKER RAVENEL BENDER
ATTORNEYS AT LAW

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SC Court of Appeals

Mariel D. Norton
mnorton@brblegal.com
(803) 343-3870 – direct dial

March 9, 2022

E-mail: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Progressive Northern Insurance Co., Respondent v. Brandon Lawrence and Ashley Outlaw,
Appellant
Appellate Case No.: 2020-001245
Our File No.: 10716.80

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter is a Motion for Protection along with Proof of Service.

By copy hereof, I am serving same upon counsel for Appellant.

Thank you very much.

Sincerely yours,


Mariel D. Norton

Enclosures

cc w/encl. via E-Mail and U.S. Mail

Jeffrey E. Johnson, Esquire firm@jjohnsonlaw.net

William V. Josephs, III, Esquire trey@josephslawfirm.com

Ashley S. Outlaw Ashleysmith_21@yahoo.com