

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

Appeal from Anderson County  
Court of Common Pleas

Alexander S. Macaulay  
Circuit Court Judge

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S.C. SUPREME COURT

Opinion No. 2013-UP-084 (S.C. Ct. App. Filed Feb. 20, 2013)

Denise F. Bowen.....Petitioner,

vs.

State Farm Mutual Automobile  
Insurance Company.....Respondent.

**RESPONDENT'S MOTION FOR EXTENSION OF  
TIME TO FILE RESPONDENT'S RETURN TO THE  
PETITION FOR A WRIT OF CERTIORARI**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the Respondent, State Farm Mutual Automobile Insurance Company, herewith moves the Court for an order granting it a thirty (30) day extension of time in which to file Respondent's Return to the Petition for a Writ of Certiorari. Respondent's Return to the Petition for a Writ of Certiorari is currently due on or before May 9, 2013. With a thirty (30) day extension of time, Respondent's Return to the Petition for a Writ of Certiorari would be due on or before June 10, 2013.

The extension requested herein is necessitated by multiple conflicts arising in other legal matters in which Respondent's counsel is involved, as well as extended out-

of-town travel and personal obligations in connection with the recent wedding and honeymoon of Respondent's counsel, Stephanie G. Flynn. This is the first extension requested by Respondent of this deadline. In light of the foregoing, Respondent, State Farm Mutual Automobile Insurance Company, respectfully requests a thirty (30) day extension of time until and including June 10, 2013, to have sufficient time to prepare and file a Return to the Petition for a Writ of Certiorari.

Finally, Respondent also respectfully requests that this Court hold the briefing time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted,

May 7, 2013

Greenville, SC



T. David Rheney, Esq. (S.C. Bar No. 13148)

Stephanie Flynn (S.C. Bar No. 16653)

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Attorneys for Respondent

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**PROOF OF SERVICE**

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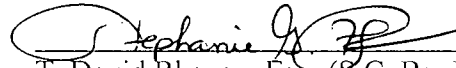
The undersigned hereby certifies that on the 7th day of May, 2013, a copy of Respondent's Motion for Extension of Time to File Respondent's Return to the Petition for a Writ of Certiorari was placed in an envelope with sufficient postage prepaid, and mailed to counsel for Appellant as follows:

Edwin L. Turnage, Esquire  
Harris and Graves, PA  
P.O. Box 6263  
Greenville, SC 29606

*(Signatures appear on following page)*

May 7, 2013

Greenville, SC



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