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May 24 2022

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 LEAVE FOR PLAINTIFF TO GRANT ARGUMENT TIME
TO *AMICUS CURIAE* UNITED POLICYHOLDERS**

Justin O'Toole Lucey, Esq.
Anna McCann, Esq.
Sohayla R. Townes, Esq.
JUSTIN O'TOOLE LUCEY, P.A.
415 Mill Street
Mt Pleasant, South Carolina 29464
(843) 849-8400
jlucey@lucey-law.com
amccann@lucey-law.com
stownes@lucey-law.com
*Attorneys for Plaintiff Sullivan
Management, LLC*

D. Larry Kristinik, Esq.
A. Mattison Bogan, Esq.
NELSON MULLINS RILEY &
SCARBOROUGH LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
(803) 799-2000
larry.kristinik@nelsonmullins.com
matt.bogan@nelsonmullins.com
*Attorneys for Defendants Fireman's
Fund Insurance Company and
Allianz GLOBAL Risks US Insurance Company*

Plaintiff Sullivan Management, LLC (“Sullivan”) respectfully moves for an Order permitting Plaintiff to share five (5) minutes of Plaintiff’s initial argument time and/or up to five (5) minutes of Plaintiff’s Reply argument time with Marshall Gilinsky,¹ counsel for *Amicus Curiae* United Policyholders, during the arguments to be held in the above-captioned action on June 8, 2022.

Counsel for Plaintiff requests this Order allowing for the sharing of time because Mr. Gilinsky’s and his client’s extensive experience in the relevant subject matter may prove helpful to Sullivan and to the Court during argument. The aforementioned experience and related substantial interest in this matter are more particularly detailed in *Amicus Curiae* United Policyholders’ Motion for Leave to File *Amicus Curiae* Brief and the filed brief itself.

Plaintiff’s counsel consulted with counsel for Defendants Fireman’s Fund Insurance Company, and Allianz GLOBAL Risks US Insurance Company, (“Defendants”) as to its intent to file the instant Motion and Defendants’ counsel indicated that they consented to this request.

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

Justin Lucey, Esq.

Anna McCann, Esq.

Sohayla Townes, Esq.

415 Mill Street

Mount Pleasant, SC 29464

(843) 849-8400

jlucey@lucey-law.com

amccann@lucey-law.com

stownes@lucey-law.com

*Attorneys for Plaintiff Sullivan Management
Insurance Company*

May 24, 2022

Mount Pleasant, South Carolina

¹ Mr. Gilinsky was admitted *pro hac vice* by Order of this Court on February 7, 2022.