

**RECEIVED**

**Jun 23 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

---

Case No. 2020-CP-40-05802

---

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance, and the  
South Carolina Department of Insurance,

Respondents,

v.

Jessica K. Altman, as Rehabilitator of Senior  
Health Insurance Company of Pennsylvania,  
Patrick H. Cantilo, as Special Deputy  
Rehabilitator of Senior Health Insurance  
Company of Pennsylvania, and Senior Health  
Insurance Company of Pennsylvania in  
Rehabilitation,

Appellants.

---

**UNOPPOSED MOTION TO ENLARGE TIME FOR FILING  
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF  
MATTER TO BE INCLUDED IN RECORD ON APPEAL**

---

Pursuant to Rule 240, and Rule 263, SCACR, Respondents Michael Wise, Acting Director of the South Carolina Department of Insurance<sup>1</sup>, and the South Carolina Department of Insurance, hereby respectfully move this Court to enlarge the time to file Respondents' Initial Brief and Designation of Matter to be Included in Record on Appeal by fourteen (14) days, from

---

<sup>1</sup> As Acting Director, Respondent Michael Wise is the successor to the Respondent Raymond G. Farmer, the recently retired Director of the South Carolina Department of Insurance.

June 30, 2022 to July 14, 2022. The grounds for this motion are that both Respondents and their counsel are addressing several pressing regulatory matters affecting this State's property and casualty market and thus require additional time to adequately prepare and finalize their brief and record designations, and an extension of time would facilitate ongoing discussions regarding a potential negotiated settlement between the parties. No prejudice will result to any party by the granting of this enlargement of time and Respondent has made no previous requests for an extension.

Before filing this motion, counsel for Respondents conferred with counsel for Appellants, who graciously consented on behalf of Appellants to the requested fourteen-(14) day extension.

Respectfully submitted this the 23<sup>rd</sup> day of June, 2022

s/ Geoffrey R. Bonham  
S.C. Bar No. 13058  
Associate General Counsel  
South Carolina Department of Insurance  
P.O. Box 100105  
Columbia, SC 29202  
[gbonham@doi.sc.gov](mailto:gbonham@doi.sc.gov)  
(803) 737-6132

*Attorney for Respondents Michael Wise,  
Acting Director of the South Carolina  
Department of Insurance, and the South  
Carolina Department of Insurance*

**RECEIVED**

**Jun 23 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

---

Case No. 2020-CP-40-05802

---

Raymond G. Farmer, as Director of the South  
Carolina Department of Insurance, and the  
South Carolina Department of Insurance,

Respondents,

v.

Jessica K. Altman, as Rehabilitator of Senior  
Health Insurance Company of Pennsylvania,  
Patrick H. Cantilo, as Special Deputy  
Rehabilitator of Senior Health Insurance  
Company of Pennsylvania, and Senior Health  
Insurance Company of Pennsylvania in  
Rehabilitation,

Appellants.

---

**CERTIFICATE OF SERVICE**

---

I hereby certify that the foregoing *Unopposed Motion to Enlarge Time for Filing Respondents' Initial Brief and Designation of Matter to Be Included in Record on Appeal* was served upon all parties and/or counsel of record by electronic mail (email attached) and by depositing a copy of same in the United States Mail, postage prepaid addressed as follows:

Denise Bessellieu, Esq.  
Cozen O'Connor  
301 South College Street  
One Wells Fargo Center

Suite 2100  
Charlotte, NC 28202  
[DBessellieu@cozen.com](mailto:DBessellieu@cozen.com)

Michael J. Broadbent, Esq.  
Cozen O'Connor  
One Liberty Place  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
[MBroadbent@cozen.com](mailto:MBroadbent@cozen.com)

*Counsel for Appellants*

s/ Geoffrey R. Bonham  
S.C. Bar No. 13058  
Associate General Counsel  
South Carolina Department of Insurance  
P.O. Box 100105  
Columbia, SC 29202  
[gbonham@doi.sc.gov](mailto:gbonham@doi.sc.gov)  
(803) 737-6132

*Attorney for Respondents Michael Wise,  
Acting Director of the South Carolina  
Department of Insurance, and the South  
Carolina Department of Insurance*

## Geoffrey Bonham

---

**From:** Geoffrey Bonham  
**Sent:** Thursday, June 23, 2022 2:49 PM  
**To:** dbessellieu@cozen.com; mbroadbent@cozen.com  
**Subject:** Farmer, et al. v. Altman, et al. - Case No. 2022-000219 (CA No. 2020-CP-40-05802)  
**Attachments:** Motion for enlargement of time of Respondents June 23 2022.pdf; Motion for enlargement of time of Respondents June 23 2022 Cert of Service.pdf

Good afternoon Denise and Michael:

Attached hereto and served upon you please find copies of the *Unopposed Motion to Enlarge Time for Filing Respondents' Initial Brief and Designation of Matter to Be Included in Record on Appeal*, which is today being filed electronically with the Clerk of Court for the South Carolina Court of Appeals. A copy has also been deposited in the mail.

Thank you for your attention to this matter.

Geoff

**Geoffrey R. Bonham** 

**Associate General Counsel**

1201 Main Street, Suite 1000  
Columbia, SC 29201

P.O. Box 100105  
Columbia, SC 29202-3105

Office: (803) 737-6219  
Cell: (803) 422-0635