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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, Chief Administrative Judge, Fifth Judicial Circuit

2020-CP-4005802

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

Respondent,

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 APPELLANTS' INITIAL REPLY
BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

Pursuant to Rule 240, and Rule 263 SCACR, appellants Michael Humphreys, the Insurance Commissioner of Pennsylvania, in his capacity as Rehabilitator of Senior Health Insurance Company of Pennsylvania¹; Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania; and Senior Health Insurance Company of Pennsylvania in

¹ As Acting Insurance Commissioner of Pennsylvania, Appellant Michael Humphreys is the successor to named appellant Jessica K. Altman, the former Insurance Commissioner of Pennsylvania.

Rehabilitation hereby respectfully move this Court to enlarge the time to file Appellants' Initial Reply Brief and Designation of Matter to be Included in Record on Appeal by thirty days, from August 11 2022, to September 12, 2022. The grounds for this motion are that Appellants counsel Michael Broadbent was and is scheduled for multiple depositions in New York and Pennsylvania, mediation in Minnesota, and hearings in Pennsylvania and Iowa , and Denise Bessellieu is scheduled for a medical procedure during the week of August 22, 2022, and thus counsel will require additional time to adequately prepare and finalize their reply brief. No prejudice will result to any party by the granting of this enlargement of time, Appellants have previously requested an enlargement of time to file their initial brief and designation of matter.

Prior to the filing of this motion, counsel for Appellants conferred with counsel for Respondents, and counsel for Respondents advised that Respondents consent to the requested thirty-day extension.

Respectfully submitted this the 9th day of August, 2022

s/ Denise L Bessellieu

COZEN O'CONNOR

Denise L Bessellieu

SC State Bar No. 16572

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Pennsylvania, as Statutory Rehabilitator for Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy Rehabilitator
of Senior Health Insurance Company of
Pennsylvania, and Senior Health Insurance
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION TO ENLARGE TIME FOR FILING APPELLANTS' INITIAL REPLY 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 (sent email attached) and by depositing a copy of the same in the United States Mail, postage prepaid addressed as follows:

Geoffrey R. Bonham
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August 9, 2022
Charlotte, North Carolina

s/Denise L Bessellieu
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**ORDER GRANTING UNOPPOSED MOTION
TO ENLARGE TIME FOR FILING APPELLANTS'
INITIAL REPLY BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL**

Upon consideration of the foregoing Unopposed Motion to Enlarge Time for Filing Appellants' Initial Reply Brief and Designation of Matter to be Included in Record on Appeal, the Court hereby grants said Motion and extends the time for filing Appellants Initial Reply Brief and Designation of Matter to be Included in Record on Appeal up to and including the September 12, 2022.

This the _____ day of August, 2022

Jenny Abbot Kitchings, Clerk
South Carolina Court of Appeals