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Jul 02 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW OF COURT
Ralph King Anderson, III, Administrative Law Judge

Case No.: 24-ALJ-09-04270-CC
Appeal Number: 2025-554

South Carolina Department of Insurance,.....Appellant.

v.

Atlantic Coast Life Insurance Company and Southern Atlantic Re, Inc...Respondents.

**APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE APPELLANT’S
INITIAL BRIEF**

Appellant South Carolina Department of Insurance hereby respectfully moves, with consent of counsel for Respondents, pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules¹ for an Order granting Respondents a thirty (30) day extension of time to file their initial brief in response to Appellant’s Initial Brief filed with the South Carolina Court of Appeals, on the following grounds:

This Appeal results from the Administrative Law Court’s Order issued on or around February 13, 2025.

Appellants request a thirty (30) day extension to continue to analyze the issues in this case and to confer with opposing counsel to attempt to resolve the issues raised in this appeal. Because of the forgoing reasons, as well as the fact that counsel for Appellants have had numerous matters

¹ Because this Motion contains a full explanation of its grounds, Respondents forego filing a supporting Memorandum, as such Memorandum would serve no useful purpose.

to attend to in other State and Federal cases, the undersigned counsel for Appellants requires additional time to complete Appellant's Initial Response Brief in this matter.

Counsel for Appellants respectfully requests an additional thirty (30) days from the current deadline in which to file an Initial Brief. As set forth above, the undersigned counsel for Respondents is informed and believes that the present deadline to file Respondents' Initial Response Brief is July 3, 2025. The extended deadline, therefore, would be August 4, 2025 because August 2, 2025 falls on a Saturday. No prior request for an extension has been filed by this party.

The undersigned counsel has received consent from all respondents.

Respectfully submitted,

/s/ Joseph A. Catalano

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Joseph A. Catalano, S.C. Bar No.: 102441

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July 2, 2025

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on Atlantic Coast Life Insurance Company and Southern Atlantic Re, Inc., via electronic mail on July 2, 2025, addressed to the attorneys of record:

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July 2, 2025
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July 2, 2025

EMAIL & US MAIL

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Atlantic Coast Life Insurance Company and Southern Re, Inc. v. South
Carolina Department of Insurance
Case No.:24-ALJ-09-04270-CC
Appeal Number: 2025-554
Our File No.: 9-766

Dear Ms. Kitchings:

Please find attached for electronic filing is Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Proof of Service in the above matter.

Also, the filing fee in the amount of \$50.00, has been sent to you via US Mail.

If you have any questions or concerns, please feel free to contact me at your convenience.

Very truly yours,

/s/ Joseph A. Catalano

Jospeh A. Catalano

JAC/saj
Enclosures

cc: Gwendolyn F. McGriff, Esquire
Brandon R. Gottschall
Carl Micarelli, Esquire
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