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Jun 22 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Samuel L. Johnson, Administrative Law Judge

Appellate Case No. 2026-000947

South Carolina Department of Insurance,.....Respondent,

v.

Joyce Freeman,Appellant.

**RESPONDENT'S MOTION FOR AN EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT AND DESIGNATION OF MATTER**

Pursuant to Rule 263, SCACR, Respondent South Carolina Department of Insurance, by and through the undersigned counsel, respectfully request a 30-day extension of the July 8, 2026 deadline by which Respondent must file its Initial Brief and Designations of Matter.

The basis for this request is that the undersigned require additional time to properly prepare the brief in light of other pressing court deadlines in state and federal court and the interim July Fourth holiday. With this extension, Respondent's Initial Brief and Designation of Matter would be due August 7, 2026. This is Respondent's first request for an extension of the deadline. Further, the undersigned reached out to opposing counsel, and Appellant does not object to this request.

Accordingly, for good cause shown, Respondent respectfully requests that the Court stay the current deadline and grant this motion for a 30-day extension to file its Initial Brief and Designations of Matter. Under Rule 240(d), SCACR, no filing fee is required here.

Respectfully submitted,

By: /s/ Robert E. Tyson, Jr

J. Calhoun Watson (10089)
Robert E. Tyson, Jr. (10820)
Sarah C. Frierson (104643)
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
(803) 929-1400
cwatson@robinsongray.com
rtyson@robinsongray.com
sfrierson@robinsongray.com

AND

Shanika J. Moore (79808)
Charles S. Gwynne, Jr. (73844)
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201
(803) 737-6158
(803) 896-9839
smoore@doi.sc.gov
cgwynne@doi.sc.gov

*Counsel for Respondent South Carolina
Department of Insurance*

Columbia, South Carolina
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PROOF OF SERVICE

Pursuant to Rule 262(c)(2), SCACR, I certify that I have served Respondent's Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter on the following counsel of record by email on June 22, 2026.

Richard A. Harpootlian
Andrew R. Hand
RICHARD A. HARPOOTLIAN, P.A.
Post Office Box 1090
Columbia, South Carolina 29202
rah@harpootlianlaw.com
arh@harpootlianlaw.com

Counsel for Appellant Joyce Freeman

(Signature page to follow)

/s/ Robert E. Tyson, Jr.
Robert E. Tyson, Jr. (10820)
ROBINSON GRAY STEPP & LAFFITTE, LLC
Post Office Box 11449
Columbia, South Carolina 29211
rtyson@robinsongray.com

AND

Shanika J. Moore (79808)
Charles S. Gwynne, Jr. (73844)
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia, SC 29201
smoore@doi.sc.gov
cgwynne@doi.sc.gov

*Counsel for Respondent South Carolina
Department of Insurance*

Columbia, South Carolina
June 22, 2026

From: [Victoria Cordoni](#)
To: ["rah@harpootlianlaw.com"](#); ["arh@harpootlianlaw.com"](#)
Cc: [Rob Tyson](#); [Sarah Frierson](#); [Cal Watson](#); [Dara Carmichael](#); ["smoore@doi.sc.gov"](#); ["charlie.gwynne@doi.sc.gov"](#)
Subject: SCDOI v. Freeman; Case No. 2026-000947
Date: Monday, June 22, 2026 3:07:00 PM
Attachments: [image001.png](#)
[2026-06-22 Respondent's First Motion for Extension of Time to File Initial Brief and Designation of Matter - AS FILED\(45769885.1\).pdf](#)
[2026-06-22 Certificate of Service - Motion for Extension to file Respondent's Initial Brief and Designation of Matter - AS FILED\(45769886.1\).pdf](#)

Dear Counsel:

Pursuant to Rule 262(c)(3), SCACR, attached for service upon you is Respondent's Motion for an Extension of Time to File Initial Brief of Respondent and Designation of Matter in the above-referenced case, as well as a Proof of Service, being filed in the Court of Appeals today.

A copy of this email will be filed with the Proof of Service.

Please let us know if you have questions.

Thanks,

Victoria



VICTORIA CORDONI PARALEGAL

DIRECT 803.231.7811
VCARD
ROBINSONGRAY.COM

2151 Pickens Street
Suite 500
PO Box 11449 (29211)
Columbia, SC 29201



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