

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

Docket No. 2014-000246

RECEIVED

JUL 02 2014

SC Court of Appeals

72690

South Carolina Department of Consumer Affairs,.....Respondents,

v.

Entera Holdings, LLC and
Entera Work Comp Solutions, LLC,Appellants.

MOTION FOR EXTENSION

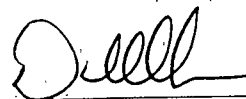
It is respectfully requested that the undersigned be granted an extension to file the Initial Reply Brief until Monday, June 30, 2014 upon the following grounds:

1. That the Initial Reply Brief of Appellants is due on Friday, June 20.
2. That the undersigned is still trying to resolve the issues presented in the matter and is meeting with the defendants herein on Wednesday, June 25, 2014 in hopes of resolving the entire issue.
3. In the event it is unable to be resolved on June 25, the undersigned has a trial in a default judgment set for Thursday, June 26 and a mediation set for Friday, June 27.

It is therefore respectfully requested that the undersigned be granted a 10 day extension to file the Initial Reply Brief of Appellants.

Respectfully Submitted.

June 20, 2014



David Hill Keller
SC Bar#: 003345
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File

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June 20, 2014

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court Of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: **South Carolina Department of Consumer Affairs v. Entera Holdings, LLC and
Entera Work Comp Solutions, LLC.**
Docket No. 2014-000246

Dear Ms. Kitchings:

Enclosed is an original and six (6) copies of a request for an extension in the above referenced matter, which is self explanatory. I have also included a check for the \$25.00 dollar filing fee.

Yours truly,



David H. Keller

DHK/cva
Enclosure

cc: Elliot Elam (w/ enclosure and COS)

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SC Court of Appeals

The South Carolina Court of Appeals

South Carolina Department of Consumer Affairs,
Respondent,

v.

Entera Holdings, LLC, and Entera Work Compensation
Solutions, LLC, Appellants.

Appellate Case No. 2014-000246

The Honorable Deborah Brooks Durden
Trial Court Case No. 2013ALJ300473CC

ORDER

The time for serving and filing the appellants' initial reply brief is hereby extended until June 30, 2014.

FOR THE COURT

BY V. Claire Allen, Deputy
CLERK

FILED

6-26-14 JGG

Columbia, South Carolina

cc:
David Hill Keller, Esquire
Elliott F. Elam, Jr., Esquire

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

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Deborah Brooks Durden, Administrative Law Judge

Docket No. 2014-000246

South Carolina Department of Consumer Affairs,Respondent,

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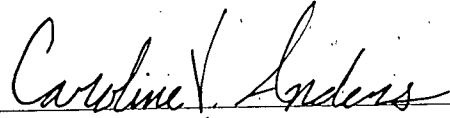
CERTIFICATE OF SERVICE

I, Caroline Anders, say that I am the legal assistant for David Hill Keller, the attorney of the defendant, with Constangy, Brooks & Smith, LLP, in Greenville, South Carolina; and that on the 20th day of June, 2014; I mailed in a sealed envelope, postage prepaid, a copy of the Motion for Extension to the following person(s) at the following address:

Jenny Abbott Kitchings
Clerk of Court
South Carolina Court Of Appeals
P.O. Box 11629
Columbia, SC 29211

Elliot F. Elam, Jr.
Deputy Director

South Carolina Department of
Consumer Affairs
Post Office Box 5757
Columbia, South Carolina 29201-5757



Caroline V. Anders
Legal Assistant to David Hill Keller
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JUNE, 30, 2014

Jenny Abbot Kitchings

CLERK OF COURT

PB Box 11629

Columbia, SC 29211

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JUL 02 2014

SC Court of Appeals

Re - Order # 2014-000246 SCD of CA v. Lintera
see attached --

Ms. Kitchings -- please accept this "letter" as a
motion for extension for the initial ~~brief~~ Reply Brief.

Ms. Allen gave me an extension until today, however
my server has crashed. Everything is digital -- including
the dictaphone, so we can't access anything -- and unfortunately
our IT Department is in Atlanta and the server is controlled
by Time Warner out of Atlanta. I worked on the brief yesterday
and came in early to finish it. However I have to leave at 11 am
for 2 out of town depositions and will not be back until late
on ~~7/1~~ 7/1. On 7/2 I have a medical appointment which
^{may} ~~will~~ keep me out of the office on Wednesday, & I have to
be in Atlanta on Thursday, & of course Friday is a holiday.

I am requesting an extension until Monday July 7th, however, if my doctor's appointment on Wednesday 7/2 does not keep me out of the office, I will get the permit out on 7/2.

Being that in such an strange form but we literally have no access to anything at the moment. As is currently 10:15 am and I need to leave for Park Hill at 11 am and have a deposition in Charleston tomorrow.

R/S

David Wilcox

David Hill Keller

003345

Confidential of Justice
~~This will certify that we made a copy of this~~
request to counsel for respondent with proper
percentage of funds on 6/30/14 as follows -

Elbert F. Sloan, Jr

Deputy Director

SC Department of Consumer Affairs

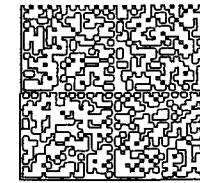
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Columbia, SC 29201-5757

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SC Court of Appeals



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Clerk of Court
South Carolina Court Of Appeals
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Columbia, SC 29211

