

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Case No. 2012-CP-07-1352

Bruce R. Hoffman,

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SC Court of Appeals

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Appellant,

v.

Seneca Specialty Insurance Company; CRC Insurance Company; CRC
Insurance Services, Inc. d/b/a Southern Cross Underwriters of Sumter;
Adylette Services of Lowcountry, Inc., and Capstone ISG, Inc.,

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

**RESPONDENT'S MOTION FOR LEAVE OF COURT
TO MOVE FOR BRIEFING EXTENSION OUT OF TIME**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley Jr. (SC Bar No. 994)
Joshua P. Cantwell (SC Bar No. 76368)
Russell G. Hines (SC Bar No. 72100)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for the Respondent

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS

COMES NOW the Respondent, Seneca Specialty Insurance Company, by and through its undersigned counsel, pursuant to Rules 240 and 263, SCACR, and, upon the grounds set forth herein, moves this Honorable Court for leave to move out-of-time for a 30-day extension of the Respondent's deadline to serve and file its initial brief and corresponding designation of matter to be included in the record on appeal.

1. The Appellant, Bruce R. Hoffman, served his initial brief on April 30, 2014.

2. Pursuant to Rules 208(a)(2) and 209(a), SCACR, the Respondent's initial brief and designation of matter were due to be served and filed last Friday, May 30, 2014.

3. Due to inadvertence, the Respondent did not serve and file its initial brief and designation of matter or move for an extension of time to do so by May 30, 2014.

4. This did not come to the attention of the undersigned until late yesterday (June 2, 2014) afternoon.

5. In light of work-related and other time commitments, the undersigned intended to move for an additional 30-days' time to serve and file the Respondent's initial brief and designation of matter. (A separate

motion requesting this relief is being served and filed contemporaneously herewith. The Respondent has not before requested an extension of time in this appeal.)

6. The undersigned respectfully submits that the Court's grant of the allowance requested herein is in the interest of justice and will not work any undue prejudice upon the Appellant.

WHEREFORE, the Respondent moves for leave of this Honorable Court to move out-of-time for a 30-day extension of the deadline for it to serve and file its initial brief and designation of matter.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)
Edward D. Buckley Jr. (SC Bar No. 994)
Joshua P. Cantwell (SC Bar No. 76368)
Russell G. Hines (SC Bar No. 72100)
P.O. Box 993
Charleston, South Carolina 29402
(843) 720-5488
Attorneys for the Respondent

Charleston, South Carolina

Dated: 

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

—————
APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

—————
Case No. 2012-CP-07-1352
—————

Bruce R. Hoffman,

Appellant,

v.

Seneca Specialty Insurance Company; CRC Insurance Company; CRC
Insurance Services, Inc. d/b/a Southern Cross Underwriters of Sumter;
Adylette Services of Lowcountry, Inc., and Capstone ISG, Inc.,

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

—————
PROOF OF SERVICE
—————

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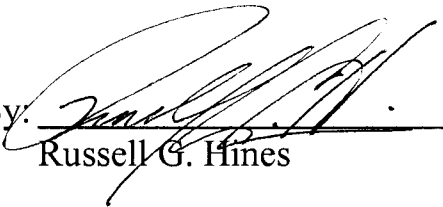
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SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for the Respondent above named, do hereby certify that I have served the **RESPONDENT'S MOTION FOR LEAVE OF COURT TO MOVE FOR BRIEFING EXTENSION OUT OF TIME** on all other parties to this appeal by depositing a copy of the same in the United States Mail, postage prepaid, on June 3, 2014, addressed as follows to said parties or their counsel of record:

Bruce R. Hoffman, Esquire
Law Office of Bruce R. Hoffman, LLC
574 Sea Island Parkway
Saint Helena Island, SC 29920
Appellant/Attorney for Appellant

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 6/3/14