

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. 2013-002578/2012-CP-07-1352

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JUN 08 2014

SC Court of Appeals

Bruce R. Hoffman,

Appellant,

v.

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

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

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

LAW OFFICE OF BRUCE R. HOFFMAN, LLC  
Bruce R. Hoffman (SC Bar No. 8716)  
574 Sea Island Parkway  
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(843) 838-5290  
*Appellant/Attorney for Appellant*

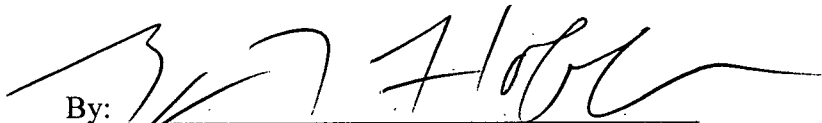
Appellant objects to and opposes Respondent's motion for leave of court to move for briefing extension out of time. Respondent's motion is made on the stated, unsworn grounds that: "Due to inadvertence [what inadvertence?], the Respondent did not serve and file its initial brief and designation of matter or move for an extension of time to do so by May 30, 2014." This is vague;

a vague motion such as this cannot possibly be granted. Assuming the inadvertence involved attorney negligence 1) attorney negligence does not constitute the required good cause 2) attorney negligence is imputed to the client, and 3) the client then has a remedy against the attorney, but objectively I suffer detriment, and thus am prejudiced, by the delay in the case and otherwise if such a vague, unsworn motion is granted without the required good cause being shown. See, e.g., Hodges v. State Farm, 488 F. Supp. 1057 (DCSC 1980), citing Hucks v. Green's Fuel, 148 SE 2d 149 (1966).

Therefore, Respondent's motion for leave of court to move for briefing extension out of time must be denied, and this appeal decided based on the initial brief and designation previously filed by Appellant.

Respectfully submitted,

LAW OFFICE OF BRUCE R. HOFFMAN, LLC

By: 

Bruce R. Hoffman (SC Bar No. 8716)  
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(843) 838-5290  
*Appellant/Attorney for Appellant*

Saint Helena Island, South Carolina

Dated: 6/5/14

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Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

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**CERTIFICATE OF SERVICE**

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I, Bruce R. Hoffman, of the Law Office of Bruce R. Hoffman, LLC, counsel for the Appellant above named, do hereby certify that I have served the **APPELLANT'S OBJECTION TO 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 5, 2014, addressed as follows to said

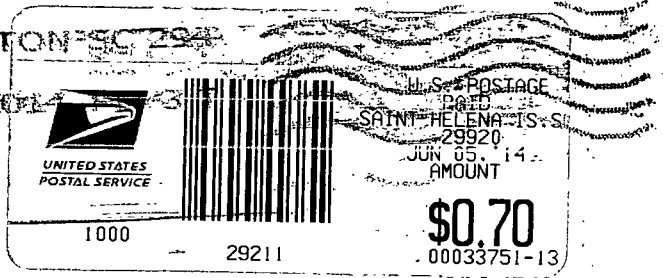
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**SC Court of Appeals**

CHARLESTON SC 294

05 JUN 2014



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JUN 09 2014

**SC Court of Appeals**

South Carolina Court of Appeals  
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