

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

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

72691

D. Craig Brown, Circuit Court Judge

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Case No. 2012-CP-07-1352

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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.

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

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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*

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JUL 02 2014

**SC Court of Appeals**

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 to extend by 30 days (from today, June 30, 2014) 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. On June 3, 2014, the Respondent served/filed Respondent's Motion for Leave of Court to Move for Briefing Extension Out of Time and also Respondent's [First] Motion for Extension of Time to Serve/File Initial Brief and Designation of Matter (collectively, the "Pending Motions").

2. In essence, the relief sought via the Pending Motions was a single, 30-day extension of the deadline for the Respondent's initial brief and designation of matter running from May 30, 2014, i.e., through today, June 30, 2014—the Appellant having served his initial brief and designation of matter on April 30, 2014.

3. In response to Pending Motions, the Appellant served/filed Appellant's Objection to Respondent's Motion for Leave of Court to Move for Briefing Extension Out of Time, arguing that he would be prejudiced by delay if the Respondent's requested relief was granted by the Court.

4. In reply to the Appellant's objection, the Respondent countered that "the Court's grant of the relief requested by the Respondent—in effect, the grant of a single, 30-day briefing extension—will not work any undue prejudice upon the Appellant; indeed, the notion that it will is plainly belied by the fact that the Appellant himself previously requested and obtained—without objection from the Respondent—two (2) briefing extensions." (Respondent's Reply served/filed June 12, 2014, p. 1.)

5. As of the time of filing of the instant motion, the Court has not yet acted upon the Pending Motions.

6. In light of work-related and other time commitments an additional 30-days' time (i.e., beyond June 30, 2014) to serve/file the Respondent's initial brief and designation of matter would be of considerable benefit to the undersigned.

7. 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.

8. Anticipating that the Appellant may again argue that he stands to be prejudiced by delay if the relief requested by the Respondent is granted, the Respondent again notes that the Appellant requested and obtained—without objection from the Respondent—two (2) briefing

extensions, which is, in effect, the relief that the Respondent requests via the instant motion.

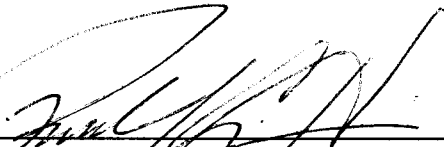
9. Additionally, the Respondent's counsel believes that the transcript of proceedings in this matter held on June 24, 2013, before the Honorable Carmen T. Mullen may be relevant to this appeal. A copy of this transcript has been ordered and the court reporter has advised that this transcript should be available soon, but, at present, the Respondent is awaiting receipt of this transcript.

WHEREFORE, the Respondent moves this Honorable Court for a 30-day extension (from June 30, 2014) of time for it to serve and file its initial brief and designation of matter. By the undersigned's calculations, if the Court's grants the requested extension, the new deadline for the Respondent's initial brief and designation of matter will be July 30, 2014.

**<SIGNED ON THE FOLLOWING PAGE>**

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)

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*Attorneys for the Respondent*

Charleston, South Carolina

Dated: 

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

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Adylette Services of Lowcountry, Inc., and Capstone ISG, Inc.,

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

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**PROOF OF SERVICE**


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YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
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P.O. Box 993  
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(843) 720-5488  
*Attorneys for the Respondent*

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 SECOND MOTION FOR EXTENSION OF TIME TO SERVE/FILE INITIAL BRIEF AND DESIGNATION OF MATTER** on all other parties to this appeal by depositing a copy of the same in the United States Mail, postage prepaid, on June 30, 2014, addressed as follows to said parties or their counsel of record:

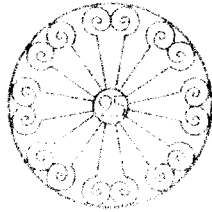
Bruce R. Hoffman, Esquire  
Law Office of Bruce R. Hoffman, LLC  
574 Sea Island Parkway  
Saint Helena Island, SC 29920  
*Appellant/Attorney for Appellant*

YOUNG CLEMENT RIVERS, LLP

By:   
\_\_\_\_\_  
Russell G. Hines

Charleston, South Carolina

Dated: 6/30/14



**YCR LAW**  
Young Clement Rivers, LLP

Russell G. Hines  
Associate

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: rhines@ycrlaw.com

June 30, 2014

**VIA U.S. MAIL**

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

Re: *Bruce R. Hoffman v. Seneca Specialty Insurance Co. (2)*  
Appellate Case No.: 2013-002578  
Circuit Case No.: 2012-CP-07-1352  
YCR File No.: 7811-20120293

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of **Respondent's Second Motion for Extension of Time to Serve/File Initial Brief and Designation of Matter** along with the original two (2) copies of **Proof of Service** for the same and our firm's check in the amount of \$25.00 for the filing fee.

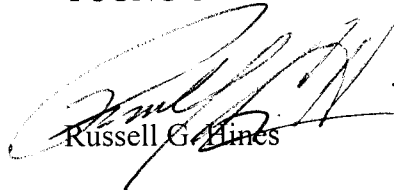
Please return a stamped copy of the motion and the proof of service in the envelope provided.

Of course, if you have any questions or concerns, just let me know.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/rg

cc: Bruce R. Hoffman, Esquire (Via U.S. Mail)

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**FIRST CLASS MAIL**

**YCR**

Young Clement Rivers, LLP

25 CALHOUN STREET, SUITE 400  
P.O. Box 993  
CHARLESTON, SC 29402

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JUL 02 2014

**SC Court of Appeals**

slb  
7811-20120293

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