

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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JUL 07 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 UNAUTHORIZED SECOND
MOTION DATED 6/30/14 FOR FURTHER EXTENSION OF TIME TO SERVE/FILE
INITIAL BRIEF AND DESIGNATION, WHEN RESPONDENT'S FIRST, LATE
MOTION FOR EXTENSION DATED 6/3/14 HAS NOT BEEN AND
CANNOT BE GRANTED/A RESPONDENT ALREADY IN DEFAULT IN THE APPEAL
CANNOT BE SEEKING A FURTHER EXTENSION**

LAW OFFICE OF BRUCE R. HOFFMAN, LLC
Bruce R. Hoffman (SC Bar No. 8716)
574 Sea Island Parkway
Saint Helena Island, South Carolina 29920
(843) 838-5290
Appellant/Attorney for Appellant

As of this writing, Respondent's first, late 6/3/14 motion for extension has not been
granted and cannot be granted, as no sworn, detailed explanation/justification for why the first

motion for extension was late has ever been submitted by any of the four attorneys listed as representing Respondent, in three filings now. Without such justification being provided for the lateness of the first motion by any of these four attorneys, or by Respondent itself, the first, late 6/3/14 motion was and remains legally deficient and cannot possibly be granted, even if the underlying reason for the extension request in that first motion had any merit, which it did not.

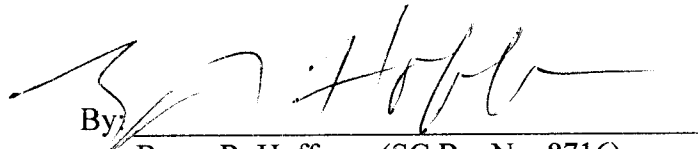
But, again, rather than addressing the threshold issue, by explaining/justifying the lateness of the first extension motion, the four attorneys for Respondent have:

1. Tried to divert the Court's attention from their being late without providing an explanation/justification for their being late, by pointing out that Appellant got an extension to file, without mentioning that any extension Appellant got was timely requested, and that Appellant is representing himself, at his own time and expense, and is and has been for over 2 years now the aggrieved party here, having had his insurance claim illegally denied;
2. Now filed a second, additional request for extension dated 6/30/14, no doubt to generate more billing, without any authority to do so as their client, Respondent, is presently in default in this appeal and can't be requesting a further extension. That the second request, based on the four listed attorneys for Respondent all still being too busy to get to Respondent's initial brief and designation, would be timely if the first request had been granted is irrelevant, as the first request has not been and cannot be granted, this second, unauthorized request is merely a smoke screen to try to cover up the deficiencies in the first request, and also obviously just another delaying tactic, like the first request was, all to Appellant's prejudice.

Therefore, Respondent's second, unauthorized 6/30/14 motion for extension, by a party in default in this appeal, must be denied (see e.g. Limehouse v. Hulsey, 744 SE2d 566 (2013)), just like Respondent's first 6/3/14 motion for leave of court to move late (without explanation) for an extension must be denied, and this appeal now decided based on the initial brief and designation of Appellant only, and/or for such other relief in favor of Appellant, or sanctions against Respondent and their counsel, as this Court deems appropriate.

Respectfully submitted,

LAW OFFICE OF BRUCE R. HOFFMAN, LLC

By: 

Bruce R. Hoffman (SC Bar No. 8716)
574 Sea Island Parkway
Saint Helena Island, South Carolina 29920
(843) 838-5290
Appellant/Attorney for Appellant

Saint Helena Island, South Carolina

Dated: July 2, 2014

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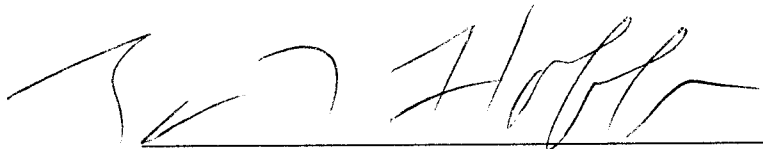
JUL 17 2014

CERTIFICATE OF SERVICE BY MAIL

SC Court of Appeals

The undersigned attorney for the Appellant hereby certifies that on the 2nd day of July, 2014, he had served by first class mail, postage prepaid, a true and accurate copy of Appellant's Objection to Respondent's Unauthorized Second Motion, etc. to Attorney for Respondent, Joshua P. Cantwell, Young Clement Rivers, LLP, PO Box 993, Charleston, SC 29402-0993.

Dated: July 2, 2014



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TRANSMITTAL COVER SHEET

Date: July 2, 2014

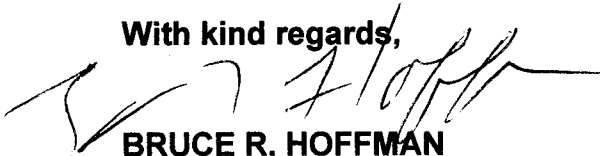
**Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211**

**RE: Bruce R. Hoffman, Appellant v. Seneca Specialty Insurance Company,
Respondent, Case No. 2013-002578/12-CP-07-1352**

Dear Clerk:

Enclosed for filing are originals and face page copies of Appellant's Objection to Respondent's Unauthorized Second Motion, etc.; and Certificate of Service by Mail of same. Please file the originals, and return the face page copies clocked in the self- addressed stamped envelope provided. Thank you for your assistance.

With kind regards,



BRUCE R. HOFFMAN

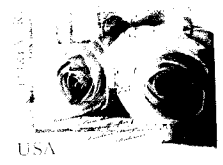
**BRH/eph
Enclosures – as stated**

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LAW OFFICE OF
BRUCE R. HOFFMAN, LLC
574 SEA ISLAND PARKWAY
SAINT HELENA ISLAND, SC 29920-4205



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