

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

**RECEIVED**

JAN 31 2012

**S.C. Supreme Court**

---

Docket No.: 07-CP-40-03116

---

Frank H. Love. . . . . Appellant,

v.

Alan Wilson, in his official capacity  
as the Securities Commissioner for  
the State of South Carolina . . . . . Respondent.

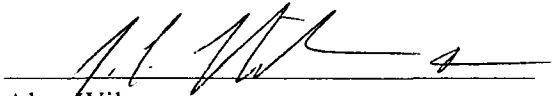
---

**MOTION TO FILE INITIAL BRIEF OUT OF TIME AND  
REQUEST FOR EXTENSION OF TIME**

---

In connection with the above-referenced appeal, the Respondent files this Motion to file Initial Brief out of time and request for extension of time. This reason for this request is due to recent personnel changes in the Attorney General's office. Originally, this case was handled by Mr. Warren Ganjehsani. Mr. Ganjehsani recently left the Attorney General's office for a position elsewhere. This case, along with all of Mr. Ganjehsani's cases, was subsequently re-

assigned to the undersigned attorney but the deadline for the Initial Brief was lost in the mix of new cases. Respondent requests an extension of thirty days for the deadline to file the Initial Brief of Respondent and/or a Motion to Dismiss. The requested extension, if granted, would make Respondent's Initial Brief and/or Motion to Dismiss due on March 2, 2012. Counsel for Respondent has not conferred with Appellant as there is no duty to consult with a pro se litigant.

  
\_\_\_\_\_  
Alan Wilson  
Attorney General of the State of South Carolina

J.C. Nicholson, III  
Assistant Attorney General

Post Office Box 11549  
Columbia, SC 29211  
Telephone: (803) 734-9916

January 31, 2012

ATTORNEYS FOR RESPONDENT

IN THE STATE OF SOUTH CAROLINA  
In the Supreme Court

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

George C. James, Jr., Circuit Court Judge

**RECEIVED**

JAN 31 2012

---

**S.C. Supreme Court**

Docket No.: 07-CP-40-03116

---

Frank H. Love. . . . . Appellant,

v.

Alan Wilson, in his official capacity  
as the Securities Commissioner for  
the State of South Carolina . . . . . Respondent.

---

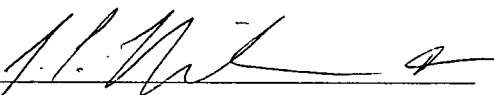
**PROOF OF SERVICE**

---

I certify that on the 31<sup>st</sup> of January, 2012, I have served the Motion to File Initial Brief out of time and Request for Extension of Time on Appellant as shown below by depositing a copy of same in the United States Mail, postage prepaid, addressed as follows:

Frank H. Love  
1025 Mason Road  
Columbia, South Carolina 29203

Pro Se Appellant

  
\_\_\_\_\_  
Alan Wilson  
Attorney General of the State of South Carolina

J.C. Nicholson, III  
Assistant Attorney General

Post Office Box 11549  
Columbia, SC 29211  
Telephone: (803) 734-9916

January 31, 2012

ATTORNEYS FOR RESPONDENT