

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2015-000637

RECEIVED
APR 14 2015
SC Court of Appeals

Home Benefits, Inc. and the
American Traveler Motor
Club, Inc.,

Respondents/Appellants,

v.

South Carolina Department of
Consumer Affairs,

Appellant/Respondent.

MOTION FOR EXTENSION

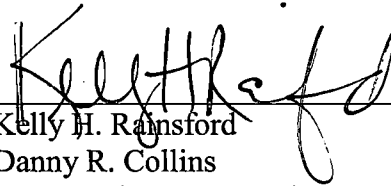
It is respectfully requested that Appellant/Respondent South Carolina Department of Consumer Affairs be granted an extension of time to file the Initial Brief of Appellant and the Designation of Matter to be Included in the Record on Appeal on the following grounds:

1. The Initial Brief of Appellant is currently due on April 20, 2015, pursuant to Rule 208(a)(1).
2. The issues and laws involved in this appeal are complex.
3. The undersigned Attorney who is preparing the brief was not involved in the lower court proceedings of this appeal. As such, additional time is required to properly assess all issues and facts contained within the record and prepare the Initial Brief of Appellant.

4. This motion is made in good faith and not merely for the purpose of delay.

It is therefore respectfully requested that Appellant/Respondent be granted a thirty (30) day extension to May 20, 2015, to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal in the above referenced matter.

Respectfully submitted,



Kelly H. Rainsford
Danny R. Collins
2221 Devine Street, Suite 200
Post Office Box 5757
Columbia, South Carolina 29250
(803) 734-4236
krainsford@scconsumer.gov
Attorneys for Appellant

April 14, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

RECEIVED

APR 14 2015

Appellate Case No. 2015-000637

SC Court of Appeals

Home Benefits, Inc. and the
American Traveler Motor
Club, Inc.,

Respondents/Appellants,

v.

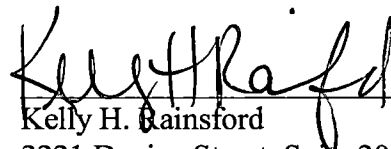
South Carolina Department of
Consumer Affairs,

Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served Appellant/Respondent's Motion for Extension on Home Benefits, Inc. and the American Traveler Motor Club, Inc. by depositing a copy of it in the United States Mail, postage prepaid, on April 14, 2015, addressed to their attorneys of record, Steven W. Hamm and C. Jo Anne Wessinger Hill, Richardson Plowden & Robinson, P.A., Post Office Drawer 7788, Columbia, South Carolina 29202.

April 14, 2015



Kelly H. Rainsford
2221 Devine Street, Suite 200
Post Office Box 5757
Columbia, South Carolina 29250
(803) 734-4236
Attorney for Appellant



The State of South Carolina
Department of Consumer Affairs

2221 DEVINE STREET, STE 200
PO BOX 5757
COLUMBIA, SC 29250-5757

Carri Grube Lybarker
Administrator/
Consumer Advocate

Celebrating Over 40 Years of Public Service

Commissioners
David Campbell
Chair
Columbia
Eboni S. Nelson
Vice Chair
Columbia
Mark Hammond
Secretary of State
Columbia
Caroline Ballington
Conway
Don Jackson
Ware Shoals
Carlisle Kennedy
Leesville
W. Fred Pennington, Jr.
Taylors

April 14, 2015

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29211

RE: Home Benefits, Inc. and the American Traveler Motor Club, Inc. v. South Carolina
Department of Consumer Affairs, Appellate Case No. 2015-000637

Dear Ms. Kitchings:

Enclosed for filing are an original and seven copies of a Motion for Extension, along with a Proof of Service, on behalf of Appellant/Respondent South Carolina Department of Consumer Affairs. Please return a clocked copy to us.

If you have any questions, please feel free to contact me at (803)734-4236.

Sincerely,

Kelly H. Rainsford
Danny R. Collins

Enclosures

cc: Steven W. Hamm, Esq. (via email and U.S. Mail)
C. Jo Anne Wessinger Hill, Esq. (via email and U.S. Mail)

RECEIVED

APR 14 2015

SC Court of Appeals

ADMINISTRATOR 803-734-4233 Fax: 803-734-4060	PUBLIC INFORMATION 803-734-4296 Fax: 803-734-4060	CONSUMER ADVOCACY 803-734-4200 Fax: 803-734-4287	ENFORCEMENT/ INVESTIGATORS 803-734-4236 Fax: 803-734-4287	CONSUMER COMPLAINTS 803-734-4200 Fax: 803-734-4286	ID THEFT UNIT 803-734-4200 Fax: 803-734-4229	PROCUREMENT & ACCOUNTING 803-734-0366 Fax: 803-734-4299
--	--	---	--	---	---	--

WEBSITE: WWW.CONSUMER.SC.GOV
E-MAIL: SCDCA@SCCONSUMER.GOV

Toll Free in SC: 800-922-1594
TDD/TYY: 800-735-2905