

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
G. Thomas Cooper, Jr., Circuit Court Judge

JUL 20 2015

S.C. SUPREME COURT

Supreme Court No. 2015-000218

CACH, LLC,Respondent,

vs.

Toby Hoffman, Jr. a/k/a Carl W. Hoffman, Jr.,Petitioner.

UNOPPOSED MOTION FOR ENLARGMENT OF TIME

The undersigned, as attorney for the Respondent, CACH, LLC, respectfully requests that the Court grant a twenty (20) day extension of time to file the Respondent's Brief.

This extension is sought for two reasons. First, Manuel H/ Newburger was out of the country from June 19, 2015 until July 12, 2015. Mr. Newburger teaches compliance with U.S. consumer laws in the Philippines and India each year. That business travel interfered with his ability to work on the response brief.

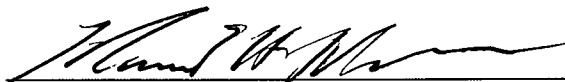
Second, although Mr. Newburger returned to his office on July 13, 2015, that same day Mr. Overcash's mother passed away, necessitating a short leave of absence to handle familial affairs. This will prevent Respondent's attorneys from conferring on the response brief.

Prior to filing this motion Mr. Newburger conferred with petitioner's counsel, Mr. Elliott, who graciously consented to the requested extension as indicated by his signature below.

Wherefore, Respondent prays that the Court grant it until August 25, 2015, to file its response brief.

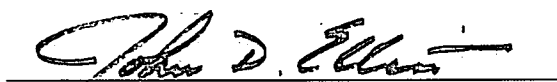
Respectfully submitted,

July 16, 2015



Manuel H. Newburger
Attorney for Respondent

Agreed:



John D. Elliott
Attorney for Petitioner

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PROOF OF SERVICE

This is to certify that on the 17th day of July, 2015, the undersigned served a copy of the **UNOPPOSED MOTION FOR EXTENSION** via email and by depositing a copy of the same into the United States Mail, postage pre-paid and in the correct amount to the following:

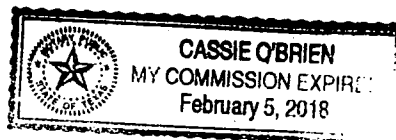
John D. Elliott, Esquire
P.O. Box 607
Columbia, SC 29202



Manuel H. Newburger
Attorney for Respondent

SWORN to before me this 17th day of July, 2015.

 (SEAL)
NOTARY PUBLIC, STATE OF TEXAS



My Commission Expires: 02/05/2018



BARRON & NEWBURGER, P.C.

Manuel H. Newburger
*Board Certified in Consumer and Commercial
Law by the Texas Board of Legal Specialization
Licensed in Texas and Colorado*

Phone: (512) 476-9103 Ext. 216 | mnewburger@bn-lawyers.com

July 17, 2015

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JUL 20 2015

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
P.O. BOX 11330
Columbia, SC 29211

Re: CACH, LLC v. Toby Hoffman, Jr., a/k/a Carl W. Hoffman, Jr.
Supreme Court Case No.; 2015-000218

Dear Mr. Shearouse:

The Respondent's Brief is due on August 5, 2015.

As one of the attorneys for the Respondent, I respectfully request a twenty (20) day enlargement of time within which to file and serve the Respondent's Brief until August 25, 2015.

I have enclosed herewith an unopposed motion requesting the extension. I have also enclosed a check for the \$25.00 filing fee, together with Proof of Service on opposing counsel.

Thank you for your consideration in this matter.

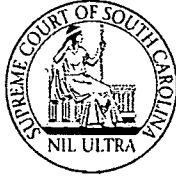
Yours truly,

BARRON & NEWBURGER, P.C.

Manuel H. Newburger

cc: John D. Elliott, Esquire
P.O. Box 607
Columbia, SC 29202
Attorney for Appellant

MHN/n



The Supreme Court of South Carolina

Barron & Newburger

07/20/2015

RECEIPT #76661

Case No: 2015-000218
Case Short Title: CACH, LLC v. Toby Hoffman
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 12283
Check/Money Order Date: 07/15/2015
Comments: