

RECEIVED

SEP 08 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley Robinson, Administrative Law Judge

Case No. 2015-001561

Jeffrey D. Allen, on behalf of Jane Doe... Appellant.

vs.

South Carolina Public Employee Benefit Authority,
Employee Insurance Program... Respondent.

MOTION FOR EXTENSION OF TIME

The Respondent, South Carolina Public Employee Benefit Authority, Employee Insurance Program, by and through their undersigned attorneys, do hereby move to extend the due date in which to file and serve its Respondent's Initial Brief and Designation of Matter from September 16, 2015 to October 16, 2015.

The undersigned has discussed this request for extension with counsel for the Appellant and opposing counsel has consented to the same.

September 8, 2015

Respectfully submitted,



Theodore D. Willard, Jr.
S.C. Bar No. 12816
MONTGOMERY WILLARD, LLC
1002 Calhoun Street
Post Office Box 11886
Columbia, South Carolina 29211-1886
Telephone: (803) 779-3500

Stephen R. Van Camp
S.C. Bar No. 7461
**SOUTH CAROLINA PUBLIC EMPLOYEE
BENEFIT AUTHORITY**
202 Arbor Lake Drive
Columbia, South Carolina 29223
Telephone: (803) 734-1228
ATTORNEYS FOR THE RESPONDENT

RECEIVED

SEP 08 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley Robinson, Administrative Law Judge

Case No. 2015-001561

Jeffrey D. Allen, on behalf of Jane Doe... Appellant.

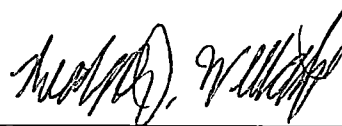
vs.

South Carolina Public Employee Benefit Authority,
Employee Insurance Program... Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time on Appellant of record by depositing a copy of the same in the United States mail, postage prepaid, on September 8, 2015, addressed to his attorneys of record, John A. Massalon, Wills Massalon & Allen, LLC, Post Office Box 859, Charleston, South Carolina, 29402 and Terry E. Richardson, Jr., Richardson Patrick Westbrook & Brickman, LLC, Post Office Box 1368, Barnwell, South Carolina, 29812.

September 8, 2015



Theodore D. Willard, Jr.
S.C. Bar No. 12816
MONTGOMERY WILLARD, LLC
1002 Calhoun Street
Post Office Box 11886
Columbia, South Carolina 29211-1886
Telephone: (803) 779-3500

Stephen R. Van Camp
S.C. Bar No. 7461
**SOUTH CAROLINA PUBLIC EMPLOYEE
BENEFIT AUTHORITY**
202 Arbor Lake Drive
Columbia, South Carolina 29223
Telephone: (803) 734-1228
ATTORNEYS FOR THE RESPONDENT

MONTGOMERY WILLARD, LLC
ATTORNEYS AND COUNSELORS AT LAW
1002 CALHOUN STREET
COLUMBIA, SOUTH CAROLINA 29201

(803) 779-3500

THEODORE D. WILLARD, JR.
TDW@MONTGOMERYWILLARD.COM
DIRECT DIAL No. (803) 753-6476

POST OFFICE BOX 11886
COLUMBIA, SOUTH CAROLINA 29211-1886

FACSIMILE (803) 799-2755
WORLD WIDE WEB [HTTP://WWW.MONTGOMERYWILLARD.COM](http://www.MONTGOMERYWILLARD.COM)

September 8, 2015

Via Hand Delivery
The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Jeffrey D. Allen v. SCBCB*
Appellate Case No. 2015-001561
Our File No.: 294962

Dear Ms. Kitchings:

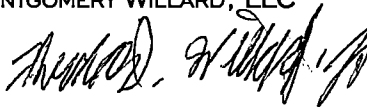
Enclosed for filing, please find an original and seven copies of the Motion for Extension of Time, along with the Proof of Service of the Motion on Appellant in the above-referenced matter. Please provide a clocked copy to our Courier delivering these documents to you. Please note that, pursuant to S.C. Appellate Rule 240(d), the motion fee is not applicable, as our client is a State of South Carolina agency.

If you have any questions, please do not hesitate to contact me.

With kind regards,

Very truly yours,

MONTGOMERY WILLARD, LLC



Theodore D. Willard, Jr.

TDW/lcb

Enclosures
cc w/ encl: John A. Massalon, Esq.
Terry E. Richardson, Jr., Esq.
Stephen R. Van Camp, Esq.

RECEIVED

SFP 08 2015

SC Court of Appeals