

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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Appeal from Richland County
In the Court of Common Pleas

S.C. Supreme Court

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2015-000218

CACH, L.L.C.....Respondent,

v.

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

MOTION TO RESCHEDULE ARGUMENT

The petitioner moves to reschedule the oral argument in this case, currently scheduled for December 1st, 2015 before this court, on the following grounds.

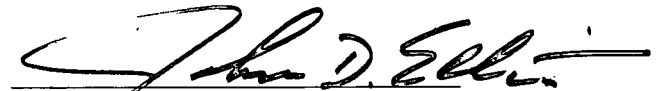
This case presents a novel and important issue about the admissibility of evidence in an action to collect a debt, brought by a large-scale buyer of debt, CACH, L.L.C. Peter A. Holland, Esquire, of Annapolis, Maryland and a former professor of consumer law, has moved to be admitted *pro hac vice*, and wishes to argue the matter for the petitioner. Indeed, his admission may have just been approved. Unfortunately, Mr. Holland has a conflict prohibiting him from appearing in order to argue the issues before the court.

Petitioner's local counsel is cognizant of his independent obligation to argue the matter. Nonetheless, this court would likely benefit from Mr. Holland's expertise in considering the

issues. Moreover, the respondent has engaged the services of Manuel H. Newburger, Esquire, of Austin, Texas, who likewise has expertise in this field to argue on its behalf, as he did in the case before the Court of Appeals. The appearance and argument by both these esteemed counsel would enhance the quality of argument before the court.

Counsel does not seek rescheduling for an extended time; rather, counsel makes this motion in the interest of justice and to allow for an informed argument on the very important issues before the court. Counsel therefore respectfully requests rescheduling of oral argument for a date and time allowing the appearance of both esteemed counsel appearing *pro hac vice*.

Respectfully submitted,



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November 9th, 2015