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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

RECEIVED

The Honorable G. Thomas Cooper, Jr., Circuit Court Judge

APR 14 2016

Case No. 2014-CP-40-0313

SC Court of Appeals

Appellate Case No. 2016-000192

Raymond G. Farmer, as Director of the South Carolina  
Department of Insurance, ..... Petitioner,

v.

CAGC Insurance Company, In Liquidation, ..... Respondent.

South Carolina Property and Casualty Insurance  
Guaranty Association, ..... Appellant,

v.

CAGC Insurance Company, In Liquidation; Raymond  
G. Farmer, in his capacity as Ancillary Receiver of  
CAGC Insurance Company, in Liquidation; and  
CompTrustAGC of South Carolina a/k/a  
CompTrustAGC of South Carolina, Inc., ..... Respondents.

**MOTION FOR EXTENSION**

Pursuant to Rule 240, SCACR, the Appellant requests a thirty-day extension of the deadline for filing its initial reply brief in response to the initial brief of Respondent Raymond G. Farmer, in his capacity as Ancillary Receiver of CAGC Insurance Company, in Liquidation ("Ancillary Receiver"), which was filed April 4, 2016.

The current deadline for Appellant's initial reply brief is April 14, 2016. With the additional time, the new deadline will be May 14, 2016. This is the first request for an extension

of this deadline. The requested extension will align the current deadline with Appellant's deadline for filing its initial reply brief in response to the initial brief of Respondent CompTrustAGC of South Carolina a/k/a CompTrustAGC of South Carolina, Inc. ("CompTrust"), which CompTrust must file by May 4, 2016.<sup>1</sup> This will allow Appellant to reply to both the Ancillary Receiver's and CompTrust's initial briefs simultaneously in one reply brief and will not delay the resolution of this appeal in any way.

The undersigned conferred with counsel for Respondent Ancillary Receiver, and he consents to this request.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: Tara C. Sullivan

Howard A. VanDine, III, SC Bar No. 00918  
E-Mail: howard.vandine@nelsonmullins.com  
A. Mattison Bogan, SC Bar No. 72629  
E-Mail: matt.bogan@nelsonmullins.com  
Erik T. Norton, SC Bar No. 73860  
E-Mail: erik.norton@nelsonmullins.com  
Tara C. Sullivan, SC Bar No. 79806  
E-Mail: tara.sullivan@nelsonmullins.com  
1320 Main Street / 17th Floor  
Post Office Box 11070 (29211-1070)  
Columbia, SC 29201  
(803) 799-2000

Attorneys for Appellant South Carolina Property and Casualty  
Insurance Guaranty Association

Columbia, South Carolina

April 14, 2016.

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<sup>1</sup> Respondent CAGC Insurance Company, in Liquidation, did not participate in the proceedings below and is not expected to file an initial brief in this Court. Accordingly, Respondent CompTrust's initial brief will be the only remaining brief to which Appellant may need to reply.

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Court of Common Pleas  
G. Thomas Cooper, Jr., Circuit Court Judge

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CompTrustAGC of South Carolina a/k/a  
CompTrustAGC of South Carolina, Inc., ..... Respondents.

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PROOF OF SERVICE

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I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for South Carolina Property and Casualty Insurance Guaranty Association, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellant's Motion for Extension

Counsel Served:

**Attorney for Respondent CAGC Insurance Company,  
in Liquidation**

David W. Boone, Esquire  
NC Department of Justice  
Post Office Box 629  
Raleigh, NC 27602

**Attorney for Respondent Raymond G. Farmer, in his  
capacity as Ancillary Receiver of CAGC Insurance  
Company, in Liquidation**

Geoffrey Ross Bonham, Esquire  
SC Department of Insurance  
Post Office Box 100105  
Columbia, SC 29202

**Attorneys for CompTrustAGC of South Carolina a/k/a  
CompTrustAGC of South Carolina, Inc.**

Michael A. Molony, Esquire  
T. Douglas Concannon, Esquire  
Young Clement Rivers, LLP  
25 Calhoun Street, Suite 400  
Charleston, SC 29401



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Lisa P. Whitehurst  
Administrative Assistant

April 14, 2016

# Nelson Mullins

Nelson Mullins Riley & Scarborough LLP  
Attorneys and Counselors at Law  
1320 Main Street / 17th Floor / Columbia, SC 29201  
Tel: 803.799.2000 Fax: 803.255.9079  
www.nelsonmullins.com

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Tara C. Sullivan APR 14 2016  
Tel: 803.255.9591  
Fax: 803.255.9079  
tara.sullivan@nelsonmullins.com  
SC Court of Appeals

April 14, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

RE: Raymond G. Farmer, etc. v. CACG Insurance Company in Liquidation  
Civil Action No. 2014-CP-40-0313  
Appellate Case No. 2016-000192  
Our File No. 00163/01649

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Appellant's Motion for Extension in regard to the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us via our courier.

By copy of this letter to counsel of record, we are serving them with a copy of this motion.

Very truly yours,



Tara C. Sullivan

TCS:lpw  
Enclosures

cc: David W. Boone, Esquire  
Geoffrey Ross Bonham, Esquire  
Michael A. Molony, Esquire  
T. Douglas Concannon, Esquire