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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from the Richland County Court of Common Pleas

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

Case No. 2014-CP-40-0313

RECEIVED

Appellate Case No.: 2016-000192

MAY 06 2016

SC Court of Appeals

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

Petitioner,

v.

CAGC Insurance Company, In Liquidation,

Respondent,

v.

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 CompTrust of South Carolina, Inc.,

Respondents.

**MOTION FOR EXTENSION OF TIME
TO FILE/SERVE INITIAL BRIEF OF RESPONDENT**

YOUNG CLEMENT RIVERS, LLP

Michael A. Molony

T. Douglas Concannon

Russell G. Hines

P.O. Box 993

Charleston, South Carolina 29402

(843) 724-6631

Attorneys for Respondent

CompTrustAGC of South Carolina a/k/a

CompTrust of South Carolina, Inc.

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent CompTrustAGC of South Carolina a/k/a CompTrust of South Carolina, Inc., by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves this Honorable Court for an additional extension of thirty (30) days' time to file/serve its initial respondent's brief and corresponding designation of matter to be included in the record on appeal.

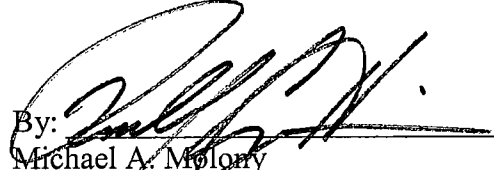
On April 1, 2016, this Respondent filed a motion for an extension of time to file/serve its initial respondent's brief and designation of matter. In response, the Court filed an Order providing that this Respondent's initial brief and designation of matter were due to be filed/served by May 4, 2016.

On account of work-related and other time commitments, an extension of thirty days' time to file/serve this Respondent's initial brief and designation of matter would be of considerable benefit to this Respondent's counsel, and, counsel respectfully submits, the grant of such time is consistent with the interests of justice and will work no undue prejudice upon any other party.

WHEREFORE, this Respondent respectfully requests that this Honorable Court grant an additional extension of 30 days' time (from May 4, 2016) to file/serve its initial respondent's brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for this Respondent's initial brief and designation of matter would be June 3, 2016, according to the undersigned's calculations. Further, this Respondent respectfully requests that the Court hold its present initial briefing/designation of matter deadline in abeyance until it acts upon this motion.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Michael A. Molony

T. Douglas Concannon

Russell G. Hines

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Attorneys for Respondent

CompTrustAGC of South Carolina a/k/a

CompTrust of South Carolina, Inc.

Charleston, South Carolina

Dated: 5/4/16

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capacity as Ancillary receiver of CAGC Insurance Company, In Liquidation;
and CompTrustAGC of South Carolina a/k/a CompTrust of South Carolina,
Inc., Respondents.

PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
Michael A. Molony
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P.O. Box 993
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(843) 724-6631
*Attorneys for Respondent
CompTrustAGC of South Carolina a/k/a
CompTrust of South Carolina, Inc.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent CompTrustAGC of South Carolina a/k/a CompTrust of South Carolina, Inc., do hereby certify that I have served the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** on the above-named Appellant and Respondents by depositing a copy of the same in the United States Mail, postage prepaid, on May 4, 2016, addressed as follows to their respective counsel of record:

Howard A. VanDine, III, Esq.
A. Mattison Bogan, Esq.
Erik T. Norton, Esq.
Tara C. Sullivan, Esq.
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street, 17th Floor
Columbia, SC 29201

David W. Boone, Esq.
NC Department of Justice
PO Box 629
Raleigh, NC 27602

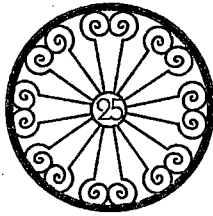
Geoffrey R. Bohnam, Esq.
South Carolina Department of Insurance
1201 Main Street, Suite 1000
Columbia SC 29201

YOUNG CLEMENT RIVERS, LLP

By: 
Russell G. Hines

Charleston, South Carolina

Dated: 5/4/16



YCR LAW

Young Clement Rivers, LLP

CELEBRATING 50 YEARS OF LEGAL SERVICE

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Partner

50 YEARS

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May 4, 2016

VIA U.S. MAIL

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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MAY 06 2016

SC Court of Appeals

Re: Raymond Farmer, etc. v. CAGC Insurance Company in Liquidation
Appellate Case No.: 2016-000192
Circuit Case No.: 2014-CP-40-0313
YCR File: 14768-20130673

Dear Ms. Kitchings:

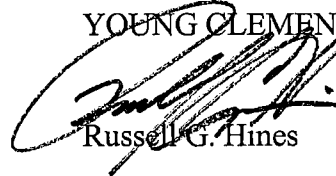
Enclosed for filing in the above-referenced matter please find the original and seven (7) copies of the **Motion for Extension of Time to File/Serve Initial Brief of Respondent** along with the original and two (2) copies of a **Proof of Service** for the same. Our firm's check in the amount of \$25 is also enclosed for the filing fee. Kindly return a stamped copy of each filed document to me in the envelope provided. By copy of this letter, I am serving all counsel of record with this filing.

Please do not hesitate to contact me should you have any questions.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/tro

cc: David Boone
Geoffrey Bonham
Tara C. Sullivan
Howard VanDine, III
Erik T. Norton
A. Mattison Bogan

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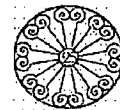
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SC COURT OF APPEALS



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