

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

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

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MAY 12 2016

SC Court of Appeals

Case No. 2014-CP-40-0313

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 an additional 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 May 16, 2016. With the additional time, the new deadline will be June 15, 2016. This is the second request for an extension of this deadline.

The original extension aligned 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"). However, CompTrust has moved for another thirty-day extension to file its initial brief by June 3, 2016.¹ Accordingly, the undersigned requests this extension in order to again align the deadline with Appellant's deadline for filing its initial reply brief in response to CompTrust's initial brief. 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.

<signature block next page>

¹ 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.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: Isaac 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

May 11, 2016.

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CompTrustAGC of South Carolina, Inc., Respondents.

PROOF OF SERVICE

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**

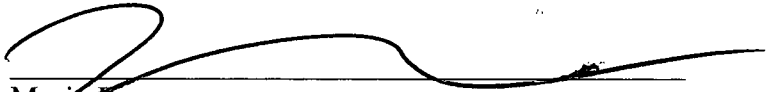
David W. Boone, Esquire
NC Department of Justice
Post Office Box 629
Raleigh, NC 27602

**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
Russell G. Hines, Esquire
Young Clement Rivers, LLP
25 Calhoun Street, Suite 400
Charleston, SC 29401



Maria Keeve
Administrative Assistant

May 11, 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

Tara C. Sullivan
Tel: 803.255.9591
Fax: 803.255.9079
tara.sullivan@nelsonmullins.com

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SC Court of Appeals

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
Russell G. Hines, Esquire

LAW OFFICES

NELSON MULLINS RILEY & SCARBOROUGH, L.L.P.

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Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law

Post Office Box 11070

Columbia, SC 29211-1070

The Honorable Jenny Abbott Kitchings

Clerk of Court

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