

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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OCT 26 2016

APPEAL FROM THE ADMINISTRATIVE LAW COURT **SC Court of Appeals**

Shirley C. Robinson, Administrative Law Judge

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Appellate Case No. 2016-002063

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South Carolina Department  
of Consumer Affairs,

Appellant,

v.

A Bargain Center, LLC,

Respondent.

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MOTION FOR EXTENSION OF TIME

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It is respectfully requested that Appellant South Carolina Department of Consumer Affairs be granted an extension of time to file the Initial Brief of Appellant and the Designation of Matter to be Included in the Record on Appeal on the following grounds:

1. The Initial Brief of Appellant is currently due on November 2, 2016, pursuant to Rule 208(a)(1) of the South Carolina Appellate Court Rules.
2. The issues in this appeal are complex and have far-reaching implications for the pawnbroker industry as well as other industries that Appellant regulates.
3. Furthermore, on October 4, 2016, the Governor of South Carolina directed the closure of State offices in Richland County from October 5 through October 7, 2016, to facilitate the planned evacuations necessary due to Hurricane Matthew.


Therefore, during the state emergency Appellant's office was closed unexpectedly for three days.

4. Due to the potential impact of the outcome of this appeal on South Carolina consumers, Appellant seeks additional time to properly assess all issues and facts contained within the record and prepare the Initial Brief of Appellant.
5. This motion is made in good faith and not merely for the purpose of delay.

It is therefore respectfully requested that Appellant be granted a thirty (30) day extension to December 2, 2016, to file the Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal in the above referenced matter.

Respectfully submitted,

October 26, 2016

  
Kelly H. Rainsford (S.C. Bar No. 15907)  
James C. Copeland (S.C. Bar No. 100054)  
Christine E. Thompson (S.C. Bar No. 101001)  
Post Office Box 5757  
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(803) 734-4200  
Attorneys for Appellant

Other Counsel of Record:  
S. Jahue Moore, Esquire  
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Attorney for Respondent

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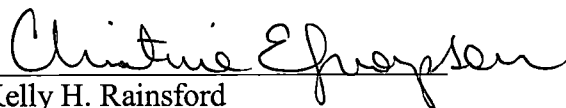
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PROOF OF SERVICE

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I certify that I have served the Motion for Extension on A Bargain Center, LLC, by depositing a copy of it in the United States Mail, postage prepaid, on October 26, 2016, addressed to the attorney of record, S. Jahue Moore, Esquire, Moore Taylor Law Firm, P.A., P.O. Box 5709, West Columbia, SC 29171.

October 26, 2016

  
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Carri Grube Lybarker  
Administrator/  
Consumer Advocate

*Celebrating Over 40 Years of Public Service*

October 26, 2016

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Taylors

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, S.C. 29211

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OCT 26 2016

SC Court of Appeals

RE: *South Carolina Department of Consumer Affairs v. A Bargain Center, LLC*  
Case No. 2016-002063

Dear Madam Clerk:

Enclosed for filing are an original and seven copies of a Motion for Extension of Time, along with a Proof of Service, on behalf of Appellant South Carolina Department of Consumer Affairs. Please return a clocked copy to the Department via interagency mail in the enclosed self-addressed envelope. If the Court has any questions, please contact me at (803) 734-4236.

Respectfully,

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Christine E. Thompson  
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*Attorneys for Appellant*

cc: S. Jahue Moore, Esquire  
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SC Court of Appeals

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