

YCR LAW

Young Clement Rivers, LLP

All Business, Insurance, Real Estate and Regulatory Matters
Admiralty/Marine • Appellate • Commercial Litigation
Commercial Real Estate • Commercial Transactions
Community Association Law • Construction Law
Employment and Labor Law • Health Care • Insurance Coverage
Products Liability • Professional Liability • Retail Liability
Special Task Litigation • Tax, Estate Planning and Probate
Trucking and Transportation • Workers' Compensation

THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY

To: 18037341499
From: KBarnes@ycrlaw.com
Date: November 16, 03:18:51 PM EST
Subj: Farmer v. GAGC, et al; Case No.: 2016-000192
Pages: 10

Good afternoon Mr. Shearouse,

Attached please find correspondence regarding our Motion for Extension to Petition for Writ of Certiorari. The original with all required copies and our filing fee check have been placed in the mail. Please do not hesitate to let me know if you need anything further.

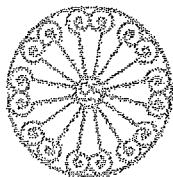
Thank you!

Katy B. Barnes
Commercial Litigation Secretary to
Stephen L. Brown, Joanna B. Stroud and Russell G. Hines
YCR LAW
25 Calhoun Street, Suite 400
Charleston, SC 29401
Phone: (843) 724-6610
Fax: (843) 579-1369

RECEIVED

NOV 19 2018

S.C. SUPREME COURT

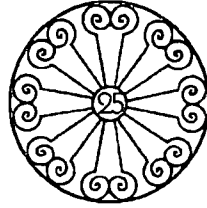


YCR LAW

25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com

Charleston Office
25 Calhoun Street, Suite 400 * Charleston, SC 29401
P.O. Box 993 * Charleston, SC 29402-0993

TELEPHONE: (843) 577-4000
WEBSITE: www.ycrlaw.com



YCR LAW

Kathleen B. Barnes
Secretary

Direct Dial: (843) 720-5488
Direct Fax: (843) 579-1369
E-mail: kbarnes@ycrlaw.com

November 19, 2018

VIA US MAIL AND FACSIMILE:

Honorable Daniel E. Shearouse, Clerk
South Carolina Supreme Court
P. O. Box 11330
Columbia, SC 29211-1330

RECEIVED

NOV 19 2018

S.C. SUPREME COURT

Re: Appellate Case No. 2016-000192
Case No.: 14-CP-40-0313
YCR File: 15140-20130673

Dear Mr. Shearouse:

Enclosed please find the original and seven (7) copies of a Motion for Extension to Petition for Writ of Certiorari, the original and one (1) copy of the Proof of Service of same and our firm's check in the amount of \$50.00 to cover the filing fee. Please file the original and return a filed-stamped copy to me in the enclosed envelope.

By copy to all counsel of record I am serving them with the same.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Kathleen B. Barnes
Secretary

Enclosures

(via US Mail and facsimile)
cc: Jenny Abbott Kitchings, Clerk of Court, South Carolina Court of Appeals
(via US Mail and email)
Howard A. VanDine, III, Esquire, Nelson Mullins Riley & Scarborough, LLP
A. Mattison Bogan, Esquire, Nelson Mullins Riley & Scarborough, LLP
Erik T. Norton, Esquire, Nelson Mullins Riley & Scarborough, LLP
David W. Boone, Esquire, North Carolina Department of Justice
Geoffrey Ross Bonham, Esquire, South Carolina Department of Insurance

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

Appeal from Richland County
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Circuit Court Case No. 2014-CP-40-0313

Opinion No. 5562 (S.C. Ct. App. filed May 23, 2018)
Ct. App. Case No. 2016-000192

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

v.

CAGC Insurance Company, in Liquidation,

South Carolina Property and Casualty Insurance
Guaranty Association,

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.,

Of whom CompTrustAGC of South Carolina a/k/a CompTrust
AGC of South Carolina, Inc., is

And South Carolina Property and Casualty Insurance
Guaranty Association is

RECEIVED

NOV 19 2018

S.C. SUPREME COURT

Petitioner,

Respondent.

Intervenor-
Petitioner,

Intervenor-
Respondents.

Petitioner,

Respondent.

**MOTION OF PETITIONER COMPTRUST FOR EXTENSION OF TIME
TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI**

**Petitioner's counsel identified on
following page*

YOUNG CLEMENT RIVERS, LLP

Michael A. Molony (SC Bar No. 4026)

T. Douglas Concannon (SC Bar No. 66316)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

Charleston, South Carolina 29401

P.O. Box 993 (29402)

(843) 720-5488

Attorneys for Petitioner,

CompTrustAGC of South Carolina

a/k/a CompTrustAGC of South

Carolina, Inc.

TO: THE HONORABLE JUSTICES OF THE SUPREME COURT OF SOUTH CAROLINA

NOW COMES Petitioner, CompTrustAGC of South Carolina a/k/a CompTrustAGC of South Carolina, Inc. ("CompTrust"), by and through its undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, as well as the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, hereby moves for an extension of ten (10) days' time to file/serve a petition to this Court for issuance of a writ of certiorari to the Court of Appeals to review its decision in this matter.

1. The Court of Appeals denied rehearing on October 18, 2018, making the deadline to file/serve a petition for a writ of certiorari Monday, November 19, 2018, pursuant to Rule 242(c), SCACR.

2. Due to other time commitments, both work- and non-work-related, the undersigned asks for the Court's allowance of ten (10) additional days, i.e., ten (10) days beyond the present November 19, 2018, deadline to prepare CompTrust's petition, submitting, most respectfully, that there is good cause to allow the requested dispensation, the same being in furtherance of the interests of justice, not unduly prejudicial to any other party, and consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, CompTrust respectfully requests that this Honorable Court

allow it an additional ten (10) days to file/serve its petition for a writ of certiorari in this matter, i.e., to extend the deadline for such petition through Thursday, November 29, 2018. Additionally, CompTrust respectfully requests that the Court hold the present deadline in abeyance until it acts upon this motion.

Respectfully submitted,
YOUNG CLEMENT RIVERS, LLP

By: 

Michael A. Molony (SC Bar No. 4026)
T. Douglas Concannon (SC Bar No. 66316)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

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

Charleston, South Carolina

Dated: 11/16/18

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

Appeal from Richland County
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Circuit Court Case No. 2014-CP-40-0313

Opinion No. 5562 (S.C. Ct. App. filed May 23, 2018)
Ct. App. 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,

Intervenor-
Petitioner,

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.,

Intervenor-
Respondents.

Of whom CompTrustAGC of South Carolina a/k/a CompTrust
AGC of South Carolina, Inc., is

Petitioner,

And South Carolina Property and Casualty Insurance
Guaranty Association is

Respondent.

PROOF OF SERVICE

**Petitioner's counsel identified on
following page*

YOUNG CLEMENT RIVERS, LLP

Michael A. Molony (SC Bar No. 4026)
T. Douglas Concannon (SC Bar No. 66316)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
(843) 720-5488

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

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioner, CompTrustAGC of South Carolina a/k/a CompTrustAGC of South Carolina, Inc., hereby certify that the foregoing **MOTION OF PETITIONER COMPTRUST FOR EXTENSION OF TIME TO FILE/SERVE PETITION FOR A WRIT OF CERTIORARI** was served on all other parties to this matter by depositing a copy of same in the U.S. Mail on November 16, 2018, properly posted for delivery to the following addressees:

Howard A. VanDine, III, Esquire
A. Mattison Bogan, Esquire
Erik T. Norton, Esquire
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211-1070

*Attorneys for Respondent
South Carolina Property and Casualty Insurance Guaranty Association*

David W. Boone, Esquire
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629

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

Geoffrey Ross Bonham, Esquire
South Carolina Department of Insurance
P.O. Box 100105
Columbia, SC 29202

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

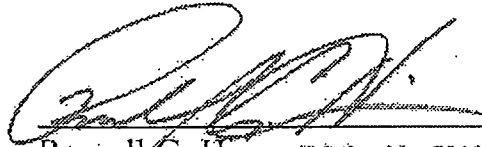
I further certify that a copy of the foregoing motion was on this date, November 16, 2018, filed with the South Carolina Court of Appeals by depositing the same in the U.S. Mail.

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Russell G. Hines (SC Bar No. 72100)

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

Charleston, South Carolina

Dated: 11/16/10