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**Jul 08 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
Appellate Case No. 2020-000935

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APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge, Dorchester County  
Maite Murphy, Circuit Court Judge, Dorchester County

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Case No. 2018-CP-18-00729

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Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg  
Respondent,

v.

Jennifer Campney, Defendant

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the Appellant.

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RESPONDENT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO BRIEF OF  
AMICUS CURIAE SOUTH CAROLINA DEPARTMENT OF CONSUMER AFFAIRS

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Respondent Portfolio Recovery Associates, LLC Assignee of Synchrony Bank/HH Gregg ("Respondent") respectfully requests a thirty (30) day extension of time within which to file and serve its response to the Brief of Amicus Curiae South Carolina Department of Consumer Affairs ("Amicus Brief"). The Amicus Brief was filed and served on June 24, 2021. Pursuant to this Court's May 27, 2021 Order, any response to the Amicus Brief must be filed within thirty (30) days of the filing of the Amicus Brief, or on or before July 24, 2021.

Respondent requests a thirty (30) day extension of this deadline, up to and including August 23, 2021. This is Respondent's first request for an extension of this deadline. The grounds for this request is that counsel for Respondent requires additional time to review and prepare the response.

Respondent has conferred with counsel for Appellant and has been advised that Appellant does not oppose the relief requested herein. Further, Respondent has conferred with counsel for the South Carolina Department of Consumer Affairs and has been advised that the South Carolina Department of Consumer Affairs consents to the extension requested herein.

Pursuant to section (c)(6) of Supreme Court Order 2020-05-29-02 RE: Operation of The Appellate Courts During the Coronavirus Emergency, this Motion is being submitted electronically via email transmission. Further, pursuant to section (l)(1) of the aforementioned Order, no filing fee is required for this Motion.

WHEREFORE, Respondent respectfully requests that it be granted an extension of thirty (30) days, up to and including August 23, 2021, within which to file and serve its response to the Amicus Brief.

Respectfully submitted,

July 8, 2021

/s/ Caren D. Enloe  
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*Admitted Pro Hac Vice*

/s/ J. Ronald Jones, Jr.  
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Attorney for Respondent

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v.

Jennifer Campney, Defendant

and

Jennifer Campney, Third-party Plaintiff,

v.

Cooling & Winter, LLC, Third-party Defendant, of whom Jennifer Campney is the Appellant.

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CERTIFICATE OF SERVICE

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I certify that I have on this day served a copy of the foregoing **RESPONDENT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO BRIEF OF AMICUS CURIAE SOUTH CAROLINA DEPARTMENT OF CONSUMER AFFAIRS** upon all parties to this action by email at the following addresses:

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*Attorneys for South Carolina Department of Consumer Affairs*

Dated this, the 8<sup>th</sup> day of July, 2021.

/s/ Kendl Ernst

Kendl Ernst, paralegal for

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