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Apr 21 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

L. Casey Manning, Chief Administrative Judge, Fifth Judicial Circuit

2020-CP-4005802

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

Respondent,

v.

Jessica K. Altman, as Rehabilitator of
Senior Health Insurance Company of
Pennsylvania, Patrick H. Cantilo, as Special
Deputy Rehabilitator of Senior Health
Insurance Company of Pennsylvania, and
Senior Health Insurance Company of
Pennsylvania in Rehabilitation,

Appellants

UNOPPOSED MOTION TO ENLARGE TIME
FOR FILING APPELLANTS' INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL

Pursuant to Rule 240, and Rule 263 SCACR, appellants Michael Humphreys, the Insurance Commissioner of Pennsylvania, in his capacity as Rehabilitator of Senior Health Insurance Company of Pennsylvania¹; Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania; and Senior Health Insurance Company of Pennsylvania in

¹ As Acting Insurance Commissioner of Pennsylvania, Appellant Michael Humphreys is the successor to named appellant Jessica K. Altman, the former Insurance Commissioner of Pennsylvania.

Rehabilitation hereby respectfully move this Court to enlarge the time to file Appellants' Initial Brief and Designation of Matter to be Included in Record on Appeal by fourteen days, from April 25, 2022, to May 9, 2022. The grounds for this motion are that both Appellants and their counsel are litigating similar issues in six different jurisdictions, as well as on appeal to the Supreme Court of Pennsylvania, and thus require additional time to adequately prepare and finalize their brief and record designations. No prejudice will result to any party by the granting of this enlargement of time and there have been no prior requests made by the Respondent for an extension.

Prior to the filing of this motion, counsel for Appellants conferred with counsel for Respondents, and counsel for Respondents advised that Respondents consent to the requested fourteen-day extension.

Respectfully submitted this the 21st day of April, 2022

s/ Denise L Bessellieu

COZEN O'CONNOR

Denise L Bessellieu

SC State Bar No. 16572

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Counsel for Appellants Michael Humphreys, Acting, Insurance Commissioner of the Commonwealth of Pennsylvania, as Statutory Rehabilitator for Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing UNOPPOSED MOTION TO ENLARGE TIME FOR FILING APPELLANTS' INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL was served upon all parties and/or counsel of record by electronic mail (sent email attached) and by depositing a copy of the same in the United States Mail, postage prepaid addressed as follows:

Geoffrey R. Bonham
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April 21, 2022
Charlotte, North Carolina

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for Senior Health Insurance Company of
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**ORDER GRANTING UNOPPOSED MOTION
TO ENLARGE TIME FOR FILING APPELLANTS'
INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL**

Upon consideration of the foregoing Unopposed Motion to Enlarge Time for Filing Appellants' Initial Brief and Designation of Matter to be Included in Record on Appeal, the Court hereby grants said Motion and extends the time for filing Appellants Initial Brief and Designation of Matter to be Included in Record on Appeal up to and including the 9th day of May, 2022

This the _____ day of April, 2022

Jenny Abbot Kitchings, Clerk
South Carolina Court of Appeals