

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

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

Plaintiffs,

vs.

Michael Humphreys, 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,

Defendants.

Civil Action No. 2020-CP-40-05802

**UNOPPOSED MOTION FOR
CONTINUANCE OF STATUS
CONFERENCE**

Plaintiffs, Raymond G. Farmer and the South Carolina Department of Insurance, by and through their undersigned counsel, hereby move the Court, for an indefinite continuance of the status conference in light of the April 15, 2022 Order of the Honorable William P. Keesley “Denying Defendants’ Motion to Dismiss, Affirming Automatic Stay, And Granting Leave To Reassert Motion Following Appellate Court Ruling(s).” As grounds for this motion, the parties offer the following:

1. This is an action for declaratory judgment and for injunctive relief as necessary to enforce the declaration, which was initiated in December 2020;
2. After a hearing held on December 15, 2021, the Honorable L. Casey Manning entered an order on January 20, 2022, granting a temporary injunction, from which Defendants have appealed pursuant to S.C. Code Ann. § 14-3-330(4);

3. On April 15, 2022, the Honorable William P. Keesley entered an Order (1) denying Defendants' motion to dismiss, with leave to re-file "after further order(s) from the appellate court(s)"; (2) leaving undisturbed Judge Manning's temporary injunction order "effectively staying the enforcement of the [Defendants' Rehabilitation] Plan in South Carolina until the Pennsylvania appellate court has decided whether the adoption of the Plan is affirmed"; and (3) confirming the stay of further proceedings in Case No. 2020-CP-40-05802 (S.C. Common Pleas) until the South Carolina appellate courts' disposition of the pending interlocutory appeal from Judge Manning's Order;

4. The Court has scheduled a status conference in this matter for Friday, April 29th, 2022, in courtroom 2-A at 9:30 a.m.

5. In light of the stay of the instant proceedings, Plaintiffs respectfully submit that a status conference is unnecessary at this time.

For the foregoing reasons, Plaintiffs respectfully request that the Court continue the scheduled status conference until such time as the stay of these proceedings may be lifted.

The undersigned counsel certifies that he has consulted with counsel for the Defendants, and Defendants have no objection to the suspension of the scheduled conference during the stay.

Respectfully submitted,

April 22, 2022

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