

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON/GREENWOOD DIVISION**

UNITED STATES OF AMERICA

v.

**RONNIE GENE WILSON
ATLANTIC BULLION & COIN, INC.,**

Defendants.

CIVIL ACTION NO.: 8:12-CV-02078-JMC

**IN RE : RECEIVER FOR
RONNIE GENE WILSON AND
ATLANTIC BULLION & COIN, INC.**

MOTION FOR EXTENSION OF TIME

Small Farmer’s Journal, Inc. (“Small Farmer’s”), by and through its undersigned counsel, hereby respectfully moves the Court, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, for a fourteen (14) day extension of time in which to respond to this Court’s Order to Show Cause dated September 5, 2012 [Docket Entry 6] (the “Order”). Small Farmer’s current deadline to answer or otherwise respond to the Order is September 21, 2012. Counsel for Small Farmer’s has consulted with counsel for the Receiver in this case and they have indicated that the Receiver has no objection to Small Farmer’s receiving additional time to respond to the Order and consents to this Motion being granted by the Court. The grounds for this Motion are as follows:

1. The undersigned counsel for Small Farmer’s was just recently retained to represent Small Farmer’s interests in this matter and respectfully submits they need additional time to gather and review the documentation necessary to respond to the Order.
2. The time to file and serve a response to the Order has not yet expired;

3. The granting of this Motion will not prejudice any party to this matter and will further promote the ends of justice being met in a fair and timely manner; and
4. Counsel for the Receiver has been consulted about the grounds for this Motion and have indicated they have no objection to the Motion being granted and do hereby consent to the Court entering an order extending the amount of time for Small Farmer's to respond to the Order.

WHEREFORE, Small Farmer's Journal Inc., respectfully moves the Court to enter an Order extending the time for Small Farmer's Journal, Inc., to serve its response the Court's Order to Show Cause until and including October 5, 2012.

Respectfully submitted, this the 19th day of September, 2012.

Respectfully Submitted,

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

/s/ Samuel W. Outten
Samuel W. Outten (Federal Bar # 2943)
soutten@wcsr.com

/s/ S. Sterling Laney, III
S. Sterling Laney, III (Federal Bar # 6255)
slaney@wcsr.com

550 S. Main Street, Suite 400
Greenville, SC 29401
Tele: (864) 255-5400
Fax: (864) 255-5440

Attorneys for Small Farmer's Journal, Inc.

September 19, 2012
Greenville, South Carolina

CERTIFICATE OF SERVICE

I hereby certify that on this the 19th day of September, 2012, the foregoing **Motion for Extension of Time** was filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing and serve counsel for all parties.

/s/ S. Sterling Laney, III
