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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

JUN 30 2022

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Master-In-Equity

Joseph M. Strickland, Master-In-Equity

Appellate Case No. 2021-001219

Case No. 2019-CP-40-05698

Justin K. Spires, Timothy J. Spires, Sr., South Carolina Department of Probation, Parole and Pardon Services and Warren B. Giese as Solicitor..... Appellant,

v.

First Citizens Bank and Trust Company, Inc..... Respondent,

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN RECORDED ON APPEAL

Respondent hereby moves pursuant to Rule 263(b), SCACR, for an extension to August 4, 2022, of the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

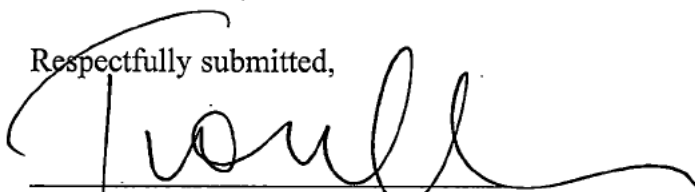
1. Respondent's counsel's wife fell on June 10, 2022 and broke her leg in several places that required two emergency surgeries and has her confined to a wheelchair.
2. Respondent's counsel is her only caregiver and has been out of the office for two weeks.

3. Respondent's counsel has not had time to finalize the draft of Respondent's Initial brief in this appeal.
4. This is Respondent's first request for an extension and a 30-day extension would not prejudice the appellant.
5. Respondent's counsel believes there is good cause to grant the requested extension of this deadline to August 4, 2022.
6. Appellant's counsel has consented to the extension.

WHEREFORE Respondent prays for an order extending the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal to August 4, 2022.

Respectfully submitted,

BY:



B. LINDSAY CRAWFORD, III  
THEODORE VON KELLER, SC BAR NO. 5718  
B. LINDSAY CRAWFORD, IV  
CHARLEY S. FITZSIMONS  
CRAWFORD & VON KELLER, LLC  
POST OFFICE BOX 4216  
COLUMBIA, SOUTH CAROLINA 29240  
(803) 790-2626  
ATTORNEYS FOR RESPONDENT

Columbia, South Carolina

June 30, 2022

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Justin K. Spires, Timothy J. Spires, Sr., South Carolina Department of Probation, Parole and Pardon Services and Warren B. Giese as Solicitor..... Appellant,

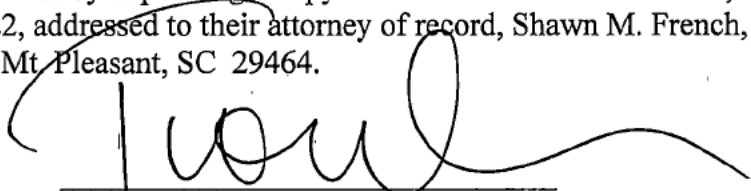
v.

First Citizens Bank and Trust Company, Inc..... Respondent,

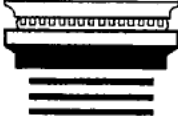
PROOF OF SERVICE

I certify that I served the foregoing Motion for Extension of Time to Serve and File Respondent's Initial Brief in this case by depositing a copy of it in the United States Mail, postage prepaid, on June 30, 2022, addressed to their attorney of record, Shawn M. French, Sr. 1476 Ben Sawyer Blvd, Suite 3, Mt Pleasant, SC 29464.

June 30, 2022



B. LINDSAY CRAWFORD, III  
THEODORE VON KELLER, SC BAR NO. 5718  
B. LINDSAY CRAWFORD, IV  
CHARLEY S. FITZSIMONS  
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ATTORNEYS FOR RESPONDENT



## CRAWFORD & VON KELLER, LLC

SOUTH CAROLINA  
B. Lindsay Crawford, III \*  
Theodore von Keller  
B. Lindsay Crawford, IV\*\*\*

NORTH CAROLINA  
Benjamin A. Barco\*\*

Charley S. FitzSimons  
Lawrence W. Johnson, Jr.\* - Special Counsel

\* Certified Specialist in Bankruptcy  
and Debtor-Creditor Law in SC

\*\*Admitted in North Carolina, Tennessee, and Texas  
\*\*\*Admitted in South Carolina and North Carolina

June 30, 2022

**Hand-Delivery**

South Carolina Court of Appeals  
1015 Sumter Street, Suite 5  
Columbia, SC 29201

**RECEIVED**

JUN 30 2022

**SC Court of Appeals**

**RE:** Justin K. Spires, Timothy J. Spires, Sr., South Carolina Department of Probation, Parole and Pardon Services, and Warren B. Giese as Solicitor  
**Of Whom Justin K. Spires and Timothy J. Spires, Sr. are the Appellants vs. First Citizens Bank and Trust Company, LLC, Respondent**  
Appellant Case No. 2021-001219  
Case No. 2019-CP-40-05698  
Our File No.: 3544.0012

Dear Sir or Madam:

Enclosed please find the original of the **Motion for Extension of Time to Serve and File Respondent's Initial Brief, Proof of Service and a check for \$50.00** in the above referenced matter. Please file the original and return a clocked copy in the enclosed envelope.

Please contact me with any questions.

Sincerely,

Crawford & von Keller, LLC

Theodore von Keller

/tdd

cc: Shawn M. French, Sr.  
1476 Ben Sawyer Blvd, Suite 3  
Mt. Pleasant, SC 29464