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JUL 26 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the 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 SECOND 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 September 6, 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:

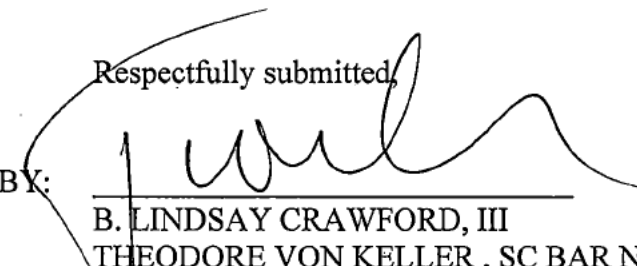
1. Counsel for Respondent is the caretaker for his wife who is confined to a wheelchair as a result of a recent fall and resulting surgeries to a severely fractured leg.
2. The duties of care have severely limited Respondents' Counsel's ability to timely finalize the initial respondents brief.

3. This is Respondent's second request for an extension and a 30-day extension would not prejudice the appellant.
4. Respondent's counsel believes there is good cause to grant the requested extension of this deadline to September 6, 2022.
5. 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 September 6, 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

July 26, 2022

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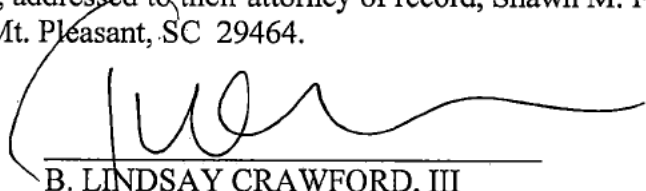
v.

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

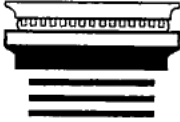
PROOF OF SERVICE

I certify that I served the foregoing Motion for Second 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 July 26, 2022, addressed to their attorney of record, Shawn M. French, Sr. 1476 Ben Sawyer Blvd, Suite 3, Mt. Pleasant, SC 29464.

July 26, 2022



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



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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

July 26, 2022

Hand-Delivery

South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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JUL 26 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 Case No. 4000-0142

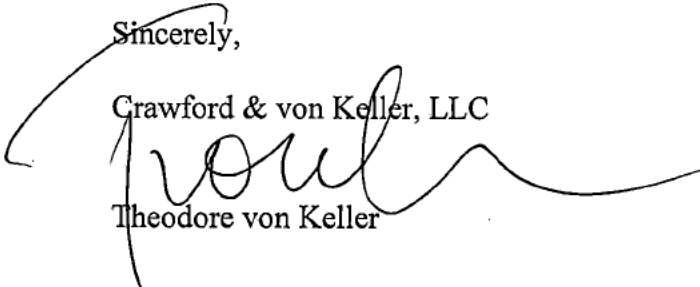
Dear Sir or Madam:

Enclosed please find the original of the **Motion for Second 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