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Nov 07 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SALUDA COUNTY
Court of Common Pleas

The Honorable Walton J. McLeod, Circuit Court Judge

Civil Action No. 2019-CP-41-00018

Appellate Case No.: 2022-001361

Santander Bank, N.A., f/k/a Sovereign Bank, N.A.,.....Appellant,

v.

Saluda Motor Sales, Inc., Benjamin G. Bradshaw, Kelly W. Sanders a/k/a Kelly Wesley Sanders,
Sanders Paint & Body, Inc., Sanders Auto Sales and Sanders Holdings, Inc., Defendants.

Of whom Benjamin G. Bradshaw is theRespondent.

**MOTION TO EXTEND TIME TO
FILE APPELLANT’S INITIAL BRIEF AND
DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, the Appellant hereby moves for an extension of time in which to file the Initial Brief and Designation of Matter to be included in the Record on Appeal in the above-referenced matter. The Appellant’s Initial Brief and Designation of Matter are now due on November 7, 2022.

The purpose of this extension is to allow the parties additional time to attempt to reach a resolution of the matters involved in this appeal and related litigation. This Motion is made in good faith and is not sought for purposes of delay. No party would be prejudiced by the extension of time sought. Counsel for Respondent has consented to this Motion. Accordingly, the

undersigned respectfully requests a thirty (30) day extension until December 7, 2022 in order to file these documents.

Respectfully submitted,

November 7, 2022

By: S/John B. Kelchner

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Civil Action No. 2019-CP-41-00018

Appellate Case No.: 2016-001568

Santander Bank, N.A., f/k/a Sovereign Bank, N.A.,.....Appellant,

v.

Saluda Motor Sales, Inc., Benjamin G. Bradshaw, Kelly W. Sanders a/k/a Kelly Wesley Sanders,
Sanders Paint & Body, Inc., Sanders Auto Sales and Sanders Holdings, Inc., Defendants.

Of whom Benjamin G. Bradshaw is theRespondent.

PROOF OF SERVICE

I certify that I have served the Motion to Extend Time to File Appellant’s Initial Brief and Designation of Record on November 7, 2022 on the above named Respondent by via email as follows:

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Attorney for Respondents Saluda Motor Sales, Inc. and Benjamin G. Bradshaw

S/John B. Kelchner
John B. Kelchner

November 7, 2022
Columbia, South Carolina