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**Dec 06 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 the .....Respondent.

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**MOTION FOR SECOND EXTENSION OF TIME TO  
FILE APPELLANT’S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

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Pursuant to Rules 240 and 263 of the South Carolina Appellate Court Rules, the Appellant hereby moves for a second 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 were originally due on November 7, 2022. By virtue of an Order entered November 7, 2022, the Court extended the time for Appellant to file its Initial Brief and Designation of Matter to December 7, 2022.

Subsequent to November 7, 2022, the parties have circulated documentation memorializing the settlement terms that will address the matters involved in this appeal and related litigation. The

purpose of this extension is to allow the parties additional time to finalize this settlement documentation. 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 fourteen (14) day extension of the current deadline to December 21, 2022 in order to file its Initial Brief and Designation of Matter.

Respectfully submitted,

December 6, 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 the .....Respondent.

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**PROOF OF SERVICE**

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I certify that I have served the Motion for Second Extension of Time to File Appellant’s  
Initial Brief and Designation of Matter on December 6, 2022 on the above named Respondent by  
via email as follows:

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Sales, Inc. and Benjamin G. Bradshaw*

S/John B. Kelchner  
John B. Kelchner

December 6, 2022  
Columbia, South Carolina