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Dec 16 2022
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

James B. Jackson, Jr., Master-in-Equity

Appellate Case No. 2022-001147

U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Conseco Finance Home Equity Loan Trust 2001-C,.....Respondent,

v.

Frances L. Mack nka Frances L. Mack-Marion,.....Appellant.

MOTION TO EXTEND DEADLINE TO SERVE AND FILE INITIAL BRIEF
AND DESIGNATION OF MATTER
TO BE INCLUDED IN RECORD ON APPEAL

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The subject deadline is presently today, December 16, 2022, and Appellant's counsel has not yet completed the initial brief. Appellant's counsel has an appellate brief that has been pending longer due on December 19, 2022, and needs to work on that.
2. Accordingly, an extension is needed.

3. This is the fourth extension sought of this deadline. The undersigned knows of no reason why another extension would be needed.
4. There is good cause for the requested extension.
5. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days.

Respectfully submitted,

/s/ Andrew S. Radeker
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Attorneys for Appellant

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v.

Frances L. Mack nka Frances L. Mack-Marion,.....Appellant.

PROOF OF SERVICE

I certify that I have served the foregoing motion for extension on the date given below by emailing it to counsel for the Respondent at the address(es) noted below.

Damon C. Wlodarczyk, Esq., at damonw@rplfirm.com

Respectfully submitted,

/s/ Andrew S. Radeker
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