

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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Mar 31 2023

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

S.C. SUPREME COURT

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 BY ONE BUSINESS DAY THE 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 an extension of one business day, to April 3, 2023, 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, March 31, 2023. While the undersigned has done substantial work on the initial brief, he fears that completing it today before midnight will not be realistic.
2. Accordingly, an extension is needed.

3. Appellant's counsel has spent today in a mediation that lasted longer than anticipated (but did result in a settlement) and has just returned from that. It is 5:57 p.m. as this sentence is being written. The time spent in mediation cut into the time to finish this brief and cut into the undersigned's energy to finish it tonight.
4. This case was only recently transferred to this Court from the Court of Appeals, and no prejudice or even substantial delay will result from extending the deadline by one business day.
5. There is good cause for the requested extension.
6. 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 one business day, to April 3, 2023.

Respectfully submitted,

/s/ Andrew S. Radeker
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March 31, 2023