

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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68831

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

George C. James, Jr., Circuit Judge

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RECEIVED

JUN 21 2013

SC Court of Appeals

Appellate Case No. 2012-213309  
Common Pleas Case No.: 2010-CP-28-1197

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U.S. Bank National Association Successor trustee to LaSalle Bank National Association, as trustee, under the Pooling and Servicing Agreement, dated as of April 1, 2002, among Asset Backed Funding Corporation, Litton Loan Servicing LP and LaSalle Bank National Association, ABFC Asset Backed Certificates, Series 2002-SB-1, .....Respondent,

v.

Kelley Burr; FIA Card Services, N.A.; Discovery Bank, Issuer of the Discover Card; Unifund CCR Partners.....Defendants,

Of Whom Kelley Burr is.....Appellant.

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RESPONDENT'S MOTION FOR ENLARGEMENT  
OF TIME TO FILE INITIAL BRIEF

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Undersigned counsel for U.S. Bank National Association Successor Trustee to LaSalle Bank National Association, as trustee, under the Pooling and Servicing Agreement, dated as of April 1, 2002, among Asset Backed Funding Corporation, Litton Loan Servicing LP and LaSalle Bank National Association, ABFC Asset Backed Certificates, Series 2002-SB-1, respectfully moves before the Court for an a thirty (30) day extension of time in which to file Respondent's

Initial Brief and Designation of Matter in Appellant's appeal. The grounds for this motion are as follows:

1. This is the first extension that the Respondent has sought in this appeal;
2. Appellant's counsel has consented to this extension, as shown by the attached email message;
3. Respondent's counsel believes there is good cause to grant the requested thirty (30) day extension to August 12, 2013 (as August 10, 2013 is a Saturday).

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file Respondent's Initial Brief for an additional thirty (30) days.

Respectfully submitted,



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*Attorneys for Respondent*

June 17, 2013  
Charleston, South Carolina

Opposing Counsel

Andrew S. Radeker, Esquire  
Harrison & Radeker, P.A.  
Post Office Box 50143  
Columbia, South Carolina 29250  
Telephone: (803) 779-2211  
Attorney for Appellant

THE STATE OF SOUTH CAROLINA  
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to LaSalle Bank National Association, as trustee,  
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Corporation, Litton Loan Servicing LP and LaSalle  
Bank National Association, ABFC Asset  
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v.

Kelley Burr; FIA Card Services, N.A.; Discovery  
Bank, Issuer of the Discover Card; Unifund CCR  
Partners.....Defendants,

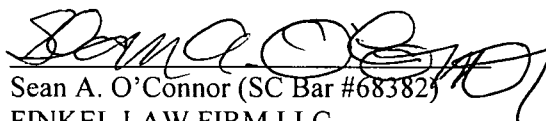
Of Whom Kelley Burr is.....Appellant.

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Respondent(s) by depositing a copy of same  
in the United States Mail, postage prepaid, on June 17, 2013, addressed to Appellant's attorney of record,  
Andrew S. Radeker, Harrison & Radeker, P.A., Post Office Box 50143, Columbia, South Carolina 29250.



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*Attorney for Respondent*

June 17, 2013

# FINKEL LAW FIRM LLC

JENNIFER L. ELLIS, PARALEGAL  
JELLIS@FINKELLLAW.COM

June 17, 2013

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

REPLY TO:  
CHARLESTON LITIGATION

RECEIVED

JUN 21 2013

SC Court of Appeals

RE: *U.S. Bank National Association successor trustee to LaSalle Bank National Association as trustee under the Pooling and Servicing Agreement dated as of April 1, 2002, among Asset Backed Funding Corporation, Litton Loan Servicing LP and LaSalle Bank National Association, ABFC Asset Backed Certificates, Series 2002-SB-1 v. Kelley Burr, FIA Card Services, N.A., Discovery Bank, Issuer of the Discover Card; Unifund CCR Partners*  
Civil Action No.: 2010-CP-28-1197  
Our File No.: 52310.45979

Dear Ms. Kitchings:

Enclosed please find the original and eight (8) copies of *Respondent's Motion for Enlargement of Time to File Initial Brief* and the related *Proof of Service* which need to be filed in connection with the above referenced matter. We respectfully request that you file same and return the extra clocked copy to our office in the enclosed envelope.

I have also enclosed check number 52845 in the amount of \$25.00 for the filing fee.

If you have any questions or concerns, please do not hesitate to contact our office.

With kind personal regards, I am

Sincerely,

Jennifer L. Ellis  
Litigation Paralegal

:jle  
Enclosure

cc: Andrew S. Radeker, Esq.

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