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**Nov 15 2023**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Benjamin C/P. Sapp, Special Referee

Case No. 2016-CP-07-01466

(Appellate Case No. 2023-001394)

Deutsche Bank National Trust Company as Trustee for NovaStar Mortgage Funding Trust Series, 2006-5, NovaStar Home Equity Loan Asset-Backed Certificates, Series 2006-5.....Respondents.

v.

Terry Lennette Grant, Pro Se.....Appellant,

**NOTICE AND MOTION TO FILE OUT OF TIME**

Terry Lennette Grant, Pro Se  
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*Counsel for Respondents*

## **NOTICE AND MOTION TO FILE OUT OF TIME**

Pursuant to Rule 240 the Appellant is hereby respectfully requesting to file her initial brief out of time. Appellant has been having multiple serious challenges that has been preventing her to stay on task with this illegal foreclosure that has been transpiring since December 1, 2009. Appellant has suffered irreparable harm, mentally, financially, emotionally and physically.

Appellants health has deteriorated over the years to fight this case. Appellant has suffered losses in death of family members during this long battle fighting this case. During this horrendous ordeal over the past 14 years, appellant has been responsible for caretaking (3) three elderly family members 1) her father, 2) her mother and 3) her disabled Uncle.

Unfortunately in April of 2023 appellate lost her father to death. This has taken a great toll on the Appellate abilities to continuously stand firm to fight to save her property over these past 14 years. Based on these facts and information the Appellant is begging the court to allow her to continue to file her initial brief out of time due to the stress, anxiety, pain, and lack of resources to assist her in defending her property from this illegal foreclosure.

The Appellant would like to take this opportunity to thank the South Carolina Court of Appeals for accepting this case. Attached you will find Appellant's Initial Brief. If at all possible Appellant is respectfully requesting that the exhibits be sent via email due to the large content of the (59) exhibits associated with her appeal. As a Pro Se litigant, Appellant is not well verse in all the Rules of Civil Procedure.

Appellant requests that the court make an immediate, but temporary, order prohibiting the Respondent and/or his/her attorney from filing and entering a default judgment until there is a decision on motion (request) for an extension.

Respectfully Submitted,

November 15, 2023

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This is to certify that I, Terry Lennette Grant sent true copies of Motion to File Out of Time to the attorney of record named below. A true copy was sent via email of records and/or U.S.Postal Service, with adequate postage prepaid for the following:

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