

RECEIVED

Dec 05 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master-In-Equity

Appellate Case No.: 2023-001054

Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of Green Tree Mortgage Trust 2005-HE1.....Respondent,

vs.

James E. Turner, a/k/a James Turner, Sr.....Appellant.

**PETITION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTERS**

NOW COMES APPELLANT, James E. Turner, Sr., by and through the undersigned attorney, petitioning the Court pursuant to *Rule 263(b), SCACR*, for an order extending the time for him to file the Appellant’s Initial Brief and Designation of Matters to be Included in the Record on Appeal to and including December 18, 2023.

The good cause to support this Petition is as follows:

1. The Court advised the parties by email and letter, dated November 07, 2023, that the Appellant’s Initial Brief and Designation of Matters [hereinafter referred to as

“Appellant’s Initial Filings”] was due thirty days from the date of the said letter. This means that the Appellant’s Initial filings are due on November 07, 2023.

2. Despite counsel’s due diligence and reasonable efforts, Appellant has been unable to finish preparing the Appellant’s Initial Filings because of his court schedule and work commitments, including the substantial amount of time that was required to prepare for the Court hearings in and out of state.
3. This is Appellant’s first request for an extension of time, and counsel reasonably believes that this will be the last extension of time needed to complete the Appellant’s Initial Filings. To that end, Appellant requests an eleven-day extension of time, to and including December 18, 2023, to file and serve the Appellant’s Initial Filings.

WHEREFORE, based upon the good cause as presented above, Appellant requests the Court to issue an order granting him an eleven-day extension of time, to and including December 18, 2023, to file and serve the Appellant’s Initial Filings.

At Orangeburg, SC

Dated: December 5, 2023

/s/ Glenn Walters, Sr.
GLENN WALTERS, Esquire
1910 Russell Street (29115)
Post Office Box 1346
Orangeburg, SC 29116
Phone: (803) 531-8844
Fax: (803) 531-3628
Email: glennwalterspa@gmail.com
SC Bar No.: 1319

Attorney for Appellant

RECEIVED

Dec 05 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Joseph M. Strickland, Master-In-Equity

Appellate Case No.: 2023-001054

Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of Green Tree Mortgage Trust 2005-HE1.....Respondent,

vs.

James E. Turner, a/k/a James Turner, Sr.....Appellant.

PROOF OF SERVICE

I, Glenn Walters, Sr., certify that I have served the foregoing **PETITION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTERS**

in this case on December 05, 2023, by mailing it to opposing counsel(s) addressed as follows:

B. Lindsay Crawford, III, Esquire
Jason Mark Hunter, Esquire
Christopher Brian Lusk, Esquire
Theodore von Keller, Esquire
CRAWFORD & von KELLER, LLC
Post Office Box 4216
Columbia, SC 29204

ted@crawfordvk.com

[Only the signature block is contained on this page].

At Orangeburg, SC

Dated: December 5, 2023

/s/ Glenn Walters, Sr. _____
GLENN WALTERS, Esquire
1910 Russell Street (29115)
Post Office Box 1346
Orangeburg, SC 29116
Phone: (803) 531-8844
Fax: (803) 531-3628
Email: glennwalterspa@gmail.com
SC Bar No.: 1319

Attorney for Appellant