

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.

**RESPONDENT’S FIRST MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
RESPONDENT’S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL**

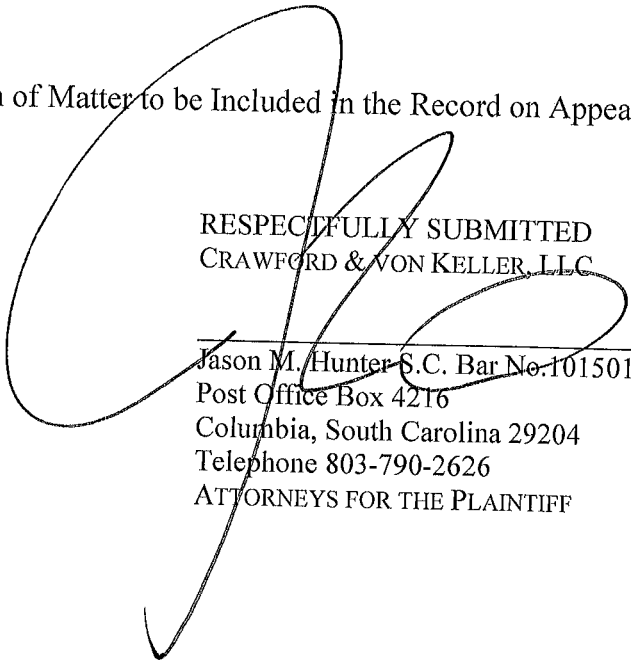
Respondent hereby moves pursuant to Rule 263(b), SCACR, for an extension of the time in which to serve and file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. Due to multiple court appearances, in and out of town, Respondent’s counsel has not had time to draft the brief in this appeal.
2. Respondent’s counsel’s second son was recently born on December 27, 2023.
3. The appeal has only recently been filed and an extension would not prejudice the Appellant.
4. Respondent’s counsel believes there is good cause to grant the requested extension of this deadline.

WHEREFORE Respondent prays for an order extending the time in which to serve and file

Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

RESPECTFULLY SUBMITTED
CRAWFORD & VON KELLER, LLC



Jason M. Hunter S.C. Bar No. 101501
Post Office Box 4216
Columbia, South Carolina 29204
Telephone 803-790-2626
ATTORNEYS FOR THE PLAINTIFF

Columbia, SC
January 16, 2024

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.: 2018-CP-40-04044

Wells Fargo Bank, N.A., not in its individual banking capacity, but solely as Trustee on behalf of
Green Tree Mortgage Trust 2005-HE1Respondent
v.

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

PROOF OF SERVICE

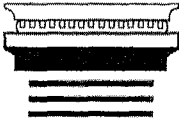
I certify that I served the foregoing Respondent’s First Motion for Extension of time to
Serve and File Respondent’s Initial Brief and Designation of Matter to be Included in Record of
Appeal in this case on the date given below by mailing it to opposing counsel at the address
noted below.

Glenn Walters, Sr.
1910 Russell Street
P.O. Box 1346
Orangeburg, SC 29116
glennwalterspa@gmail.com

Respectfully submitted,

s/Jason M. Hunter
Jason M. Hunter
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Attorney for Respondent

January 16, 2024



CRAWFORD & VON KELLER, LLC

RECEIVED

Jan 16 2024

SC Court of Appeals

SOUTH CAROLINA
B. Lindsay Crawford, III *
Theodore von Keller
B. Lindsay Crawford, IV**

NORTH CAROLINA
Benjamin A. Barco
Brittany T. Morrison**
William Kibbe

Charley S. FitzSimons
Jason M. Hunter
Eric H. Nelson
Lawrence W. Johnson, Jr.* - Special Counsel

* Certified Specialist in Bankruptcy
and Debtor-Creditor Law in SC

**Admitted in South Carolina and North Carolina

January 16, 2024

Via ctappfilings@sccourts.org
SC Court of Appeals
PO Box 11629
Columbia, SC 29211

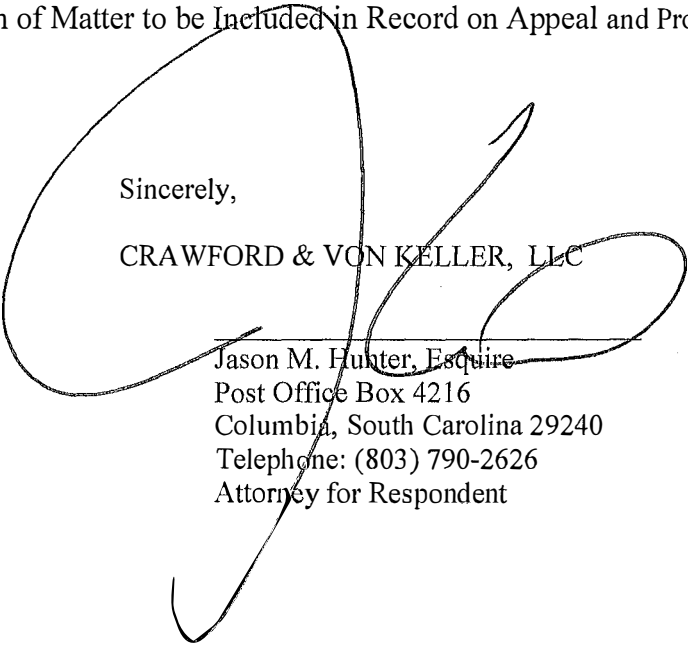
**RE: Wells Fargo Bank, N.A., not in its individual banking capacity, but solely as
Trustee on behalf of Green Tree Mortgage Trust 2005-HE1 vs. James E. Turner
a/k/a James Turner, Sr.
Appellate Case No.: 2018-CP-40-04044**

Dear Sir/Madam:

Enclosed please find Respondent's First Motion for Extension of Time to Serve and File Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal and Proof of Service regarding the above referenced matter.

Sincerely,

CRAWFORD & VON KELLER, LLC



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Post Office Box 4216
Columbia, South Carolina 29240
Telephone: (803) 790-2626
Attorney for Respondent

JMH/tdd
Enclosure

Cc: Glenn Walters, Sr.
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