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Aug 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

J. Mark Hayes, II, Circuit Judge

Appellate Case No. 2024-000372

Wilmington Savings Fund Society FSB as Trustee of Stanwich Mortgage Loan Trust
I,.....Respondent,

v.

Ebonee D. Brown; Georgia M. Brown; South Carolina Department of Motor
Vehicles,.....Defendants,

of whom Ebonee D. Brown and Georgia M. Brown are theAppellants.

MOTION FOR EXTENSION OUT OF TIME TO SERVE AND FILE
INITIAL BRIEF AND DESIGNATION

Appellants hereby move pursuant to Rule 263(b), SCACR, for an extension out
of time to today, August 23, 2024, of the time to serve and file Appellant’s initial brief
and designation of matter in this appeal. The grounds for this motion are that there is
good cause to grant the requested extension, as the following shows:

1. Unexpected events, including several in other cases, took time away
from what the undersigned had to devote to writing the brief in this
case. As is noted in the attached exhibit, the undersigned notified
opposing counsel of that development and, in light of the response he

received, was under the impression that opposing counsel did not have a problem with a short extension out of time.

2. The brief is now complete and is being filed with this motion.
3. There is no prejudice, and certainly no unfair prejudice, to the Respondent if this extension is granted.
4. There is good cause for the requested extension.
5. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellants pray for an order granting an extension out of time to today, August 23, 2024, of the time to serve and file Appellant's initial brief and designation of matter in this appeal.

Respectfully submitted,

/s/ Andrew S. Radeker
Andrew S. Radeker
S.C. Bar No. 73743
Radeker Law, P.A.
Post Office Box 6903
Columbia, South Carolina 29260
(803) 500-0891
drew@radekerlaw.com
Attorney for Appellants

August 23, 2024

Drew Radeker

From: Meredith Coker <mcoker@mtglaw.com>
Sent: Wednesday, August 21, 2024 4:32 PM
To: Drew Radeker
Subject: RE: Brown 2024-000372

Thanks for letting me know. I am in the weeds drafting one myself so good luck!



Meredith Coker

Associate Attorney
3550 Engineering Drive, Suite 260
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*Licensed in SC and VA

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mcoker@mtglaw.com

From: Drew Radeker <Drew@radekerlaw.com>
Sent: Wednesday, August 21, 2024 4:10 PM
To: Meredith Coker <mcoker@mtglaw.com>
Subject: RE: Brown 2024-000372

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Meredith:

I may need to seek another extension on this brief, but not a long one. Got jammed up on some entirely unexpected things that came up, my wife's been out of town, and I have a case on deck for trial tomorrow that I had thought would surely settle.

If I don't finish this tonight, I plan to submit the brief tomorrow, accompanied by a motion to serve and file it out of time. Just giving you a heads up.

Thanks.

Drew Radeker
RADEKER LAW, P.A.

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From: Meredith Coker <mcoker@mtglaw.com>
Sent: Thursday, June 6, 2024 1:41 PM
To: Drew Radeker <Drew@radekerlaw.com>
Subject: Brown 2024-000372

Good afternoon.

I am following up to see if you have had any communication with the court reporter with regard to the transcript that was due 6/3/24?



Meredith Coker

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SEND PHYSICAL MAIL TO: McMichael Taylor Gray, LLC, 3550 Engineering Drive, Suite 260, Peachtree Corners, GA 30092

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NOTICE REGARDING ATTORNEY-CLIENT RELATIONSHIP: No attorney-client relationship exists between us unless a formal agreement has been signed.

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of whom Ebonee D. Brown and Georgia M. Brown are theAppellants.

PROOF OF SERVICE

I certify that I have served the foregoing motion for extension on the date given
below by emailing it to other counsel of record at the address(es) noted below.

Meredith L. Coker, Esq., at mcoker@mtglaw.com

Respectfully submitted,

/s/ Andrew S. Radeker

Andrew S. Radeker

S.C. Bar No. 73743

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Attorney for Appellants

August 23, 2024