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Sep 24 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Alan D. Clemmons, Master in Equity
Trial Case No.: 2016-CP-26-08043

Appellate Case No. 2024-000813

Waterfall Victoria Grantor Trust II, Series G, Appellant,

v.

E. Carroll Rogers a/k/a Ernest Carroll Rogers; Paulla W. Rogers; Branch Banking and Trust Company; Briarcliffe Acres Association; United States of America, Department of Treasury, Internal Revenue Service; South Carolina Department of Revenue, Defendants,

of which E. Carroll Rogers a/k/a Ernest Carroll Rogers is Respondent.

NOTICE OF MOTION TO EXTEND DEADLINE TO FILE AND SERVE INITIAL BRIEF
AND DESIGNATION OF MATTER

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Attorney for Appellant

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Phone: (470) 474-7149
Attorney for Appellant

NOTICE IS HEREBY GIVEN that the appellant, Waterfall Victoria Grantor Trust II, Series G, by and through the undersigned counsel, hereby requests an extension until October 4, 2024 to file and serve its initial brief and designation of matter. There has been one previous request for an extension for filing and serving these documents. Appellant's initial brief and designation of matter are scheduled to be filed and served on September 27, 2024. Appellant requests this one-week extension because the undersigned attorney, who was recently retained, is preparing the initial brief and designation of matter. I have a previously-scheduled flight to Fort Lauderdale, Florida in the early afternoon of Thursday, September 26, 2024, and I had planned to finish the initial brief and designation of matter prior to that flight; however, I received word from the airline this evening, Tuesday, September 24, 2024, that, because of Tropical Storm Helene, there may be a delay in that flight and that I could change my flight. I have changed my flight to Wednesday, September 25, 2024 in order to keep my appointment to meet others there.



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*Co-Counsel for Appellant Waterfall Victoria
Grantor Trust II, Series G*

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of which E. Carroll Rogers a/k/a Ernest Carroll Rogers is Respondent.

PROOF OF SERVICE

I certify that I have served Appellant's Notice of Motion to Extend Deadline to File and Serve Initial Brief and Designation of Matter on the counselors of record listed below, by electronic mail of the same on September 24, 2024, addressed to:

January N. Taylor, Esq.

jtaylor@mtglaw.com

J. Pamela Price, Esq.

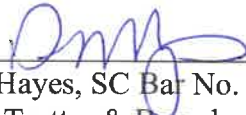
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SC Court of Appeals

September 24, 2024

Via Email: ctappfilings@sccourts.org

Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, SC 29201

Re: Waterfall Victoria Grantor Trust II, Series G, Appellant v. E. Carroll Rogers,
Respondent
Appellate Case No.: 2024-000813
MTB File No.: 22708.1

Dear Ms. Kitchings:

Following are appellant's notice of motion to extend deadline to file and serve initial brief and designation of matter and the proof of service. The motion fee will be set to the court of appeals.

Thank you for your consideration of this request.

Sincerely,

Dean A. Hayes

DAH/

cc: January N. Taylor, Esq.
J. Pamela Price, Esq.
Meredith L. Coker, Esq.
Roger Paul Roy, Jr., Esq.