

RECEIVED

Nov 20 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
IRespondent,

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.

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

Dean A. Hayes
McCabe, Trotter & Beverly, P.C.
4500 Fort Jackson Blvd., Ste. 335
Columbia, SC 29209
(803) 724-5000
Attorney for Respondent

Meredith L. Coker
McMichael Taylor Gray, LLC
3350 Engineering Drive, Suite 260
Peachtree Corners, GA 30092
(470) 474-7149
Attorney for Respondent

Andrew S. Radeker
Radeker Law, P.A.
P.O. Box 6903
Columbia, SC 29260
(803) 500-0891
Attorney for Appellants

NOTICE IS HEREBY GIVEN that the respondent, Wilmington Savings Fund Society FSB as Trustee of Stanwich Mortgage Loan Trust I, hereby requests a thirty-day extension of time to file and serve its initial brief and designation of matter. Respondent's initial brief and designation of matter are currently due on November 21, 2024. The basis for this request is that respondent's current co-counsel of record, Meredith L. Coker, has opened her own law practice and will no longer be representing respondent. I made an appearance in this matter yesterday as co-counsel for respondent, and I learned that we did not have a transcript from a hearing in this matter. I request the extension to obtain the transcript and to prepare the initial brief and designation of matter. This is respondent's first request for an extension to file and serve its initial brief and designation of matter.

Respectfully submitted,

/s/ Dean A. Hayes

Dean A. Hayes

SC Bar # 66066

McCabe, Trotter & Beverly, P.C.

4500 Fort Jackson Blvd., Ste. 335

Columbia, SC 29209

(803) 724-5000

dean.hayes@mccabetrotter.com

Attorney for Respondent

RECEIVED

Nov 20 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
IRespondent,

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.

PROOF OF SERVICE

I certify that, on November 20, 2024, I have served respondent’s motion for extension of time to file initial brief and designation of matter by emailing it to other counsel of record at the address noted below:

Meredith L. Coker @ mcoker@mtglaw.com and mcoker@cokerfirm.com
Andrew S. Radeker @ drew@radekerlaw.com

Respectfully submitted,

/s/ Dean A. Hayes

Dean A. Hayes

SC Bar # 66066

McCabe, Trotter & Beverly, P.C.

4500 Fort Jackson Blvd., Ste. 335

Columbia SC 29209

(803) 724-5000

dean.hayes@mccabetrotter.com

Attorney for Respondent