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Nov 22 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Kristi F. Curtis, Circuit Court Judge

Case No. 2019-CP-10-4503
Appellate Case No. 2023-001844

Deutsche Bank Trust Company Americas, as Trustee for Residential
Accredit Loans Inc., Pass-Through Certificates 2007 QH2.....Respondent,
v.

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for
2235 Shoreline Drive originally dated the 3rd day of March 2010; Shoreline
Farms Community Association, Inc.; Wells Fargo Bank, N.A.; Cadle
Rock Joint Venture, L. P. an Ohio Limited Partnership, Curtis Rogers and
Julie Rogers, Defendants,

Of whom Curtis Rogers, Julie Rogers and Ashley Johnson Beshara as
Trustee of the Revocable Trust Agreement for 2235 Shoreline Drive originally
dated 3rd day of March 2010 are.....Appellants,
AND

Ashley Johnson Beshara as Trustee of the Revocable Trust Agreement for 2235
Shoreline Drive originally dated 3rd day of March 2010, Third-Party Plaintiff,
v.

Nationstar Mortgage, LLC, Curtis Rogers, and Julie Rogers.....Third-Party Defendant.

**NOTICE OF MOTION AND MOTION FOR AN EXTENSION
OF TIME TO FILE THE INITIAL REPLY BRIEF OF APPELLANT**

Appellants, Curtis Rogers, Julie Rogers and Ashley Johnson Beshara as Trustee of the
Revocable Trust Agreement for 2235 Shoreline Drive originally dated the 3rd day of March 2010,
were served with Nationstar Mortgage, LLC’s initial brief on November 18, 2024. Appellants by
and through their undersigned counsel, respectfully moves before this Court for an order granting,
Appellants a ten (10) day extension of time or until December 12, 2024, in which to file
Appellants’ Initial Reply Brief in response to Nationstar Mortgage, LLC’s initial brief. The
grounds for the motion are the upcoming Thanksgiving Holiday. Prior to filing this motion counsel
for Appellants communicated with all parties counsel of record and said counsel gave their consent
to Appellants requested motion.

[SIGNATURE BLOCK TO FOLLOW]

November 22, 2024.

THE LAW OFFICE OF
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AND

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v.

Nationstar Mortgage, LLC, Curtis Rogers, and Julie Rogers.....Third-Party Defendant.

CERTIFICATE OF SERVICE

I certify that on this 2th day of May 2024, I have served Appellant’s Motion for Extension
of Time to File upon all other counsel of record at the email address listed for said counsel on AIS
as follows:

[ADDRESSES TO FOLLOW]

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Loans, Inc., Pass-Through Certificates 2007-QH2
and Nationstar Mortgage LLC*

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November 22, 2024

Jenny Abbott Kitchings
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**RE: Deutsche Bank Trust Company Americas, as Trustee for Residential
Accredit Loans Inc., Pass-Through Certificates 2007 QH2 v. Ashley
Johnson Beshara, et al.
Appellate Case No. 2023-001844**

Madam Clerk:

Enclosed please find in regard to the above referenced matter the following:

- 1) Appellants, Ashley Johnson Beshara, Curtis Rogers, and Julie Roger's Consent Motion for a ten day extension of time to file Appellants' Initial Reply Briefs;
- 2) Proof of Service for the Motion;
- 3) A corresponding check for the same.

I kindly request that you file the same.

With kind regards,

RESPECTUFLLY SUBMITTED,

THE LAW OFFICE OF
DAVID CONOR KEYS, LLC



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Attorney for Appellant Ashley Johnson Beshara

Enclosures:
(as stated)

CC: Sammie Arnold; Thomas Richmond McPherson; and Jasmine K. Gardner.