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Dec 20 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Robert L. Reibold, Administrative Law Judge  
Milton G. Kimpson, Administrative Law Judge

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Appellate Case No. 2024-001577

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U.S. Bank National Association, ..... Appellant,  
v.  
South Carolina Department of Revenue, ..... Respondent.

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MOTION FOR SECOND EXTENSION OF TIME TO FILE  
APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN  
RECORD ON APPEAL

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Pursuant to Rules 208(a)(1), 209(a), 240, and 263 of the South Carolina Appellate Court Rules, Appellant U.S. Bank National Association (“U.S. Bank”) requests a thirty-day extension of time to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal (“Designation”) in the above-captioned matter.

This request is necessitated because counsels' other case demands and scheduling deadlines as well as the impending holidays will not allow them to complete the Initial Brief and Designation within the current deadline. Currently, these filings are due on **January 8, 2025**. By our calculations, the pending request would make the new deadline **February 7, 2025**.

This is Appellant’s second request for an extension of this deadline. The requested extension will not prejudice any party, and counsel for Respondent South Carolina Department of

Revenue has consented to this request. Appellant also requests that the Court hold the current deadline in abeyance pending the Court's consideration of this Motion.

/s/ Bryson M. Geer

Bryson M. Geer (SC Bar No. 13606)  
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Counsel for Appellant, U.S. Bank National Association

December 20, 2024

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Robert L. Reibold, Administrative Law Judge  
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Appellate Case No. 2024-001577

U.S. Bank National Association, ..... Appellant,  
v.  
South Carolina Department of Revenue, ..... Respondent.

PROOF OF SERVICE

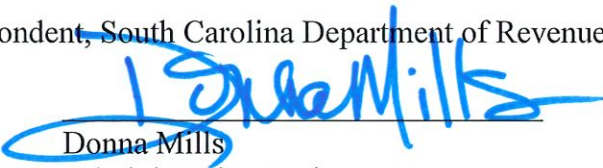
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant U.S. Bank National Association, hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified pursuant to Supreme Court Order 2024-04-24-01:

Pleadings: MOTION FOR SECOND EXTENSION OF TIME TO FILE APPELLANT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Counsel Served: Via E-Mail  
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W. Allen Myrick, Jr., Esq.  
Jason P. Luther, Esq.  
South Carolina Department of Revenue  
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Columbia, SC 29210  
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Counsel for Respondent, South Carolina Department of Revenue



Donna Mills  
Administrative Assistant

December 20, 2024

## Donna Mills

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**From:** Donna Mills  
**Sent:** Friday, December 20, 2024 1:14 PM  
**To:** 'marcus.antley@dor.sc.gov'; 'allen.myrick@dor.sc.gov'; Jason.Luther@dor.sc.gov  
**Cc:** 'craig.fields@blankrome.com'; 'nicole.johnson@blankrome.com'; Bryson Geer  
**Subject:** U.S. Bank National Association v. S.C. Department of Revenue; Case No. 2024-001577  
**Attachments:** 2024.12.20 US Bank - LtrT SCCA encl 2nd Extension Request re Initial Brief & DOM.pdf; 2024.12.20 US Bank - US Bank's 2nd Req for EOT to file Initial Brief & DOM (24-1577).pdf; 2024.12.20 US Bank - (POS) US Bank's 2nd Req for EOT to file Initial Brief & DOM (24-1577).pdf

Good afternoon,

Attached for service upon you in the above matter is correspondence with the Court from Bryson Geer and U.S. Bank, N.A.'s Motion for Second Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal.

Thank you,



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DONNA MILLS ADMINISTRATIVE ASSISTANT  
donna.mills@nelsonmullins.com

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151 MEETING STREET | CHARLESTON, SC 29401  
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December 20, 2024

**RECEIVED**

**Dec 20 2024**

**SC Court of Appeals**

**Via Electronic Mail**

The Honorable Jenny Abbott Kitchings  
SC Court of Appeals  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: U.S. Bank National Association v. S.C. Department of Revenue  
Administrative Law Court Case No. 20-ALJ-17-0168-CC  
Appellate Case No. 2024-001577  
Our File No. 015366/09010

Dear Ms. Kitchings:

Enclosed please find U.S. Bank National Association's Motion for Second Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal in the above-referenced matter for electronic filing. We also enclose our firm check in the amount of \$50.00 as the required filing fee.

By copy of this letter to counsel of record, we are serving them with a copy of this motion.

Thank you for your assistance.

With kind regards,



Bryson M. Geer

BMG:dfm

Cc: Marcus D. Antley, III, Esq.  
W. Allen Myrick, Jr., Esq.  
Jason P. Luther, Esq.  
Craig B. Fields, Esq.  
Nicole L. Johnson, Esq. (*All Via E-Mail*)

NELSON MULLINS RILEY & SCARBOROUGH LLP

SYNOVUS BANK  
COLUMBIA, SC

ATTORNEYS AND COUNSELORS AT LAW

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COLUMBIA, SC 29211-1070

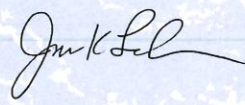
67-119  
539

Date: December 18, 2024

Pay: Fifty and 00/100\*\*\*\*\* \$ \*\*\*50.00\*\*\*

PAY TO THE ORDER OF: South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

NELSON MULLINS RILEY & SCARBOROUGH LLP  
ORIGINAL SIGNATURE REQUIRED IF OVER \$500  
VOID AFTER 180 DAYS



Memo:

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Check #: 1088250

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Check Date: Dec 18/24

Inv #	Inv Date	G/L Acct	Client	Matter	Narrative	Amount	Inv Total
12172024	Dec 17/24		015366	09010		\$50.00	\$50.00

Vendor: Clerk, SC Court of Appeals Invoice#: 12172024 Date: 12/17/2024  
- CRINV - - 12/17/24 - Motion Filing Fee - 2nd Request for Extension to  
File Initial Brief / DOM

Invoice Totals: \$50.00 \$50.00