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Dec 31 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Joseph M. Strickland, Master-In-Equity

Appellate Case No.: 2023-001054

Wells Fargo Bank, National Association, not in its individual or banking capacity, but solely as Trustee on behalf of Green Tree Mortgage Trust 2005-HE1.....Respondent,

vs.

James E. Turner, a/k/a James Turner, Sr.....Appellant.

**APPELLANT’S FIRST
MOTION FOR EXTENSION OF TIME TO SERVE RECORD ON APPEAL ON
RESPONDENT AND FILE PROOF OF SERVICE**

NOW COMES APPELLANT, James E. Turner, Sr., by and through the undersigned attorney, pursuant to *Rule 263(b), SCACR*, moving/petitioning the Court for an order extending the time for Appellant to file and service the Record on Appeal as required by *Rule 210, SCACR*.

Appellant asserts that there is good cause to grant this motion as follows:

1. *Rule 210, SCACR*, provides, in part, the following: “Within thirty (30) days after service of the last brief, the appellant shall serve a copy of the Record on Appeal on each party who has served a brief. Proof of service of the Record shall be immediately filed with the clerk of the appellate court.”
2. The last initial brief in this case was filed by the Respondent on December 03, 2024. Therefore, based on the rule as cited above, Appellant is required to file and serve the Record on Appeal on January 02, 2025.
3. Appellant uses an outside commercial source (“FedEx Kinko’s”) to assist in the completion of the Record on Appeal. Due to circumstances beyond counsel’s control and the holiday schedules, Appellant reasonably believes that he will not have the Record on Appeal completed by January 02, 2025. Moreover, as customary, the legal staff is on a reduced schedule until after January 01, 2025. To that end, out of an abundance of caution, Counsel is requesting an additional ten days (10) to comply with *Rule 210, SCACR*.

WHEREFORE, for the reasons stated above, Appellant requests an order granting him until January 13, 2025 in order to serve the Record on Appeal on the Respondent and file the required proof of service.

December 31, 2024

/s/ Glenn Walters, Sr.

GLENN WALTERS, Esquire
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Post Office Box 1346
Orangeburg, SC 29116
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Trustee on behalf of Green Tree Mortgage Trust 2005-
HE1.....Respondent,

vs.

James E. Turner, a/k/a James Turner, Sr.....Appellant

PROOF OF SERVICE

I, Glenn Walters, Sr., certify that I have served a copy of foregoing Motion for
Extension of Time on Respondent Wells Fargo Bank, National Association, by depositing a
copy of it in the United States Mail, postage prepaid, on December 31, 2024, addressed to its
attorneys of record as follows: **Lindsay B. Crawford, III, Esquire, PO Box 4216,
Columbia SC 29240.**

At Orangeburg, SC

December 31, 2024

/s/ Glenn Walters, Sr.
Glenn Walters, Sr.
Attorney for Appellant

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