

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity  
Civil Action Number: 2022-CP-40-02905

Appellate Case No.: 2024-000917

U.S. Bank Trust National Association, as Trustee of the Tiki Series IV Trust, .....  
..... Respondent,  
v.  
Angela T. Franks, .....  
..... Appellant.

**MOTION TO EXTEND DEADLINE TO SERVE AND FILE INITIAL BRIEF AND  
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent, U.S. Bank Trust National Association, as Trustee of the Tiki Series IV Trust, hereby moves, pursuant to Rule 263(b), SCACR, for a thirty-day (30) extension of time to file its initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are as follows:

1. The deadline is for filing the above-reference documents is currently January 9, 2025.
2. This is the first extension that Respondent has sought in this appeal.
3. Such extension is necessary in order to allow co-counsel, who was only retained today, to fully and adequately prepare a response to the initial brief and designation of matter submitted by Appellant, as counsel for the Respondent was unaware of any deadline for filing the same until today.

WHEREFORE, Respondent prays for an order extending the time in which to file and serve its initial brief and designation of matter until February 10, 2025.

Respectfully Submitted,

*s/ Dean A. Hayes*

Dean A. Hayes (SC Bar # 66066)

McCabe, Trotter & Beverly, PC

4500 Fort Jackson Blvd., Ste 335

Columbia, SC 29209

Main: (803) 724-5000

Direct: (803) 724-5006

Email: [dean.hayes@mccabetrotter.com](mailto:dean.hayes@mccabetrotter.com)

*Attorney for U.S. Bank Trust National Association,  
as Trustee of the Tiki Series IV Trust*

January 16, 2025  
Columbia, South Carolina

**RECEIVED**

**Jan 16 2025**

**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  
Civil Action Number: 2022-CP-40-02905


Appellate Case No.: 2024-000917

U.S. Bank Trust National Association, as Trustee of the Tiki Series IV Trust, .....  
..... Respondent  
v.  
Angela T. Franks, .....  
..... Appellant

**PROOF OF SERVICE**

I certify that I have served the Respondent’s motion to extend deadline to file and serve its initial brief and designation of matter by mailing it to the pro se Appellant and emailing it to other counsel of record at the address noted below:

Angela T. Franks, P.O. Box 983, Columbia, SC 29202  
January N. Taylor, Esq. (jtaylor@mtglaw.com)

  
\_\_\_\_\_  
Dean A. Hayes, SC Bar #66066  
Co-Counsel for Respondent U.S. Bank Trust  
National Association, as Trustee of the Tiki  
Series IV Trust