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May 27 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

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

Appellate Case No. 2024-001577

U.S. Bank National Association, Appellant,

v.

South Carolina Department of Revenue, Respondent.

U.S. BANK NATIONAL ASSOCIATION’S MOTION FOR SECOND EXTENSION OF TIME
TO FILE APPELLANT’S INITIAL REPLY BRIEF

Pursuant to Rules 208(a)(3), 240, and 263 of the South Carolina Appellate Court Rules, Appellant U.S. Bank National Association (“U.S. Bank”) requests a ten-day extension of time to file its Initial Reply Brief in the above-captioned matter.

This request is necessitated because counsels' other case demands and scheduling deadlines will not allow them to complete this brief within the current deadline. Currently, this filing is due on June 2, 2025. By our calculations, it would be due on Thursday, June 12, 2025 with the additional ten-day extension.

This is U.S. Bank’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. U.S. Bank also requests that the Court hold the current deadline in abeyance pending the Court’s consideration of this Motion.

Therefore, U.S. Bank respectfully moves this Court for a ten-day extension of time to file its Initial Reply Brief in the above-captioned matter until **Thursday, June 12, 2025**.

/s/ Bryson M. Geer

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Counsel for Appellant U.S. Bank National Association

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Robert L. Reibold, Administrative Law Judge
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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, hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified:

Pleadings: U.S. BANK NATIONAL ASSOCIATION'S MOTION FOR
SECOND EXTENSION OF TIME TO FILE APPELLANT'S
INITIAL REPLY BRIEF

Counsel Served: Via E-Mail
Marcus D. Antley, Esq.
W. Allen Myrick, Jr., Esq.
Jason P. Luther, Esq.
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jason.luther@dor.sc.gov

Counsel for Respondent South Carolina Department of Revenue



Donna Mills
Administrative Assistant

May 27, 2025

Donna Mills

From: Donna Mills
Sent: Tuesday, May 27, 2025 11:43 AM
To: 'marcus.antley@dor.sc.gov'; 'allen.myrick@dor.sc.gov'; Jason Luther
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: 2025.05.27 US Bank - LtrT SCCA encl MOT for 2nd Extension re Initial Reply Brief.pdf; 2025.05.27 US Bank - MOT for 2nd Extension re Initial Reply Brief.pdf; 2025.05.27 US Bank - (POS) MOT for 2nd Extension re Initial Reply Brief.pdf

Good morning,

Attached for service upon you in the above matter is correspondence with the Court concerning U.S. Bank National Association's Motion for Second Extension of Time to File Appellant's Initial Reply Brief and the accompanying motion. We plan to file these with the Court shortly.

Please feel free to call me if you have any questions or concerns.

Thank you,



DONNA MILLS ADMINISTRATIVE ASSISTANT

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May 27, 2025

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

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May 27 2025

SC Court of Appeals

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 Reply Brief 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 this matter.

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
ATTORNEYS AND COUNSELORS AT LAW

PO BOX 11070
COLUMBIA, SC 29211-1070

SYNOVUS BANK
COLUMBIA, SC

Date: May 23, 2025

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: _____



Payee: South Carolina Court of Appeals

Check #: [Redacted]

Vendor ID: [Redacted] Vendor Assigned Customer #: [Redacted]

Check Date: May 23/25

Inv #	Inv Date	G/L Acct	Client	Matter	Narrative	Amount	Inv Total
[Redacted]	May 23/25		[Redacted]	[Redacted]		\$50.00	\$50.00
Vendor: Clerk, SC Court of Appeals Invoice#: [Redacted] Date: 5/23/2025 - CRINV - - 05/23/25 - Motion Filing Fee - 2nd Request for Extension to File Initial Reply Brief							
Invoice Totals:						\$50.00	\$50.00