

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

70051
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OCT 14 2013
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
R. Markley Dennis, Jr., Circuit Judge
Appellate Case Tracking No. 2013-000563
Trial Court Case No. 2010-CP-10-5199

FAMILY SERVICES, A SOUTH CAROLINA ELEEMOSYNARY ORGANIZATION, IN ITS
CAPACITY AS CONSERVATOR FOR ALBERT JORDAN, *Respondent*,

v.

QUICKEN LOANS, INC., A MICHIGAN CORPORATION; CHASE HOME FINANCE, LLC, A
DELAWARE LIMITED LIABILITY COMPANY; AND GWENDOLYN M. JORDAN, *Defendants*.

Of Whom QUICKEN LOANS, INC. AND CHASE HOME FINANCE, LLC, *are the Appellants*.

And

CHASE HOME FINANCE, LLC, *is Counterclaimant, Cross-Claimant, and Third-Party
Plaintiff*,

v.

GWENDOLYN M. JORDAN, *Cross-Claim Defendant*.

and ALBERT JORDAN, INDIVIDUALLY, ANTONIO JORDAN, JOHN DOE, AND HOUSEHOLD
FINANCE CORPORATION II, *Third-Party Defendants*.

CONSENT MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Respondent Family Services, a South Carolina Eleemosynary Organization, as Conservator for Albert Jordan, hereby requests and moves this Court to grant an extension of time until November 11, 2013, by which the Respondent may file and serve its Initial Brief of Respondent and Designation of Matter to be

2nd
10-11-13
11-12-13

Included in Record on Appeal in the above-referenced matter or, alternatively, the parties may submit a consent motion apprising the Court of a settlement between the parties and seeking the withdrawal or dismissal of this appeal. Respondent and Appellants consent to this request.

The grounds for the motion are that counsel for the Appellants and Respondent have reached tentative terms to settle and resolve all claims pending between the Appellants and Respondent, including the claims at issue in this appeal. The tentative settlement terms include an agreement to withdraw or dismiss this appeal. The parties are currently in the process of exchanging and executing a written document formally memorializing the settlement agreement; however, it is not expected the formal settlement agreement will be completed and fully executed by the parties by October 11, 2013, which is when Respondent's Initial Brief and Designation of Matter to be Included in Record on Appeal are currently due to be served and filed. Upon full execution of the formal settlement agreement, the parties will apprise the Court of same and will make a consent motion for dismissal of this appeal.

Accordingly, the Respondent requests an extension of time until November 11, 2013, to file and serve its Initial Brief of Respondent and Designation of Matter to be Included in Record on Appeal or, alternatively, the parties may submit a consent motion apprising the Court of a settlement between the parties and seeking the withdrawal or dismissal of this appeal.

Respondent's counsel has consulted with Appellants' counsel regarding this motion and was advised that Appellants consent to the motion.

ROSEN, ROSEN & HAGOOD, LLC

By: _____

Richard S. Rosen

Daniel F. Blanchard, III

James A. Bruorton, IV

151 Meeting Street, Suite 400

Charleston, SC 29401

(843) 577-6726

October 10, 2013.

ATTORNEYS FOR RESPONDENT

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
R. Markley Dennis, Jr., Circuit Judge
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v.

QUICKEN LOANS, INC., A MICHIGAN CORPORATION; CHASE HOME FINANCE, LLC, A
DELAWARE LIMITED LIABILITY COMPANY; AND GWENDOLYN M. JORDAN, *Defendants*.

Of Whom QUICKEN LOANS, INC. AND CHASE HOME FINANCE, LLC, *are the Appellants*.

And

CHASE HOME FINANCE, LLC, *is Counterclaimant, Cross-Claimant, and Third-Party
Plaintiff*,

v.

GWENDOLYN M. JORDAN, *Cross-Claim Defendant*.

and ALBERT JORDAN, INDIVIDUALLY, ANTONIO JORDAN, JOHN DOE, AND HOUSEHOLD
FINANCE CORPORATION II, *Third-Party Defendants*.

PROOF OF SERVICE


I certify that I have served the Consent Motion for Extension of Time on the other parties in
this action by causing a copy of same to be deposited in the United States Mail, first class postage
prepaid, on October 10, 2013, addressed to their attorneys of record as follows:

Desa Ballard, Esquire
Stephanie Weissenstein, Esquire
Harvey M. Watson, III, Esquire
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West Columbia, SC 29169
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ATTORNEYS FOR HOUSEHOLD FINANCE
CORPORATION II

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October 10, 2013.

ATTORNEYS FOR RESPONDENT

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DANIEL F. BLANCHARD III
dblanchard@rrhlawfirm.com

October 10, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: Family Services, a South Carolina eleemosynary organization in its capacity as Conservator for Albert Jordan v. Quicken Loans Inc., et al.
Case No. 2010-CP-10-5199
Case Tracking No. 2013-000563

Dear Ms. Kitchings:

On behalf of Respondent Family Services, a South Carolina eleemosynary organization, in its capacity as Conservator for Albert Jordan, please find enclosed the original and seven copies of the Consent Motion for Extension of Time in the above-referenced matter. Our firm's filing fee check for \$25.00 is also enclosed. We consulted with counsel for the Appellants and they have no objection to this request.

We would greatly appreciate your filing these on our behalf and returning a clocked-in copy in the envelope provided.

Thank you in advance for your assistance with this matter. With kind regards, I am

Sincerely,



Daniel F. Blanchard, III

DFB;db
Enclosed check

Cc: Mr. Jonathan McClain, Family Services
Desa Ballard, Esquire
Stephanie Weissenstein, Esquire
Harvey M. Watson, III, Esquire
Brian L. Boger, Esquire
Thomas M. Kennaday, Esquire