

Physical Address:  
4500 Fort Jackson Blvd. Suite 335  
Columbia, SC 29209

Locations in:  
Mount Pleasant, SC



McCABE, TROTTER & BEVERLY, P.C.

[www.mccabetrotter.com](http://www.mccabetrotter.com)

Phone: (803) 724-5000

Fax: (803) 724-5001

July 29, 2025

Dean Hayes  
Shareholder

Dean.Hayes@mccabetrotter.com

RECEIVED

JUL 31 2025

SC Court of Appeals

**VIA US FIRST CLASS MAIL**

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201


**RE: APPEAL: US Bank v. Franks, Angela T; CMS Roofing LLC**  
**Appellate Case No.: 2024-000917**  
**Our File: 22350.1.2**

Dear Sir or Madam,

Please be advised I represent the Respondent in the above-referenced matter. Our deadline to file and serve the Initial Brief and Designation of Matter of Respondent is July 31, 2025. We would like to respectfully request a thirty (30) day deadline to file and serve the Initial Brief and Designation of Matter of Respondent.

Thank you for your time and consideration. We look forward to hearing from you.

Sincerely,

  
Dean Hayes

cc: Angela Franks (via regular mail)  
Client (via email only)



McCABE, TROTTER & BEVERLY, P.C.

4500 Ft. Jackson Blvd., Suite 335, Columbia, SC 29209

COLUMBIA SC 290

29 JUL 2025 PM 4 L



**FP**  **US POSTAGE**  
**\$000.74<sup>0</sup>**

**First-Class - IMI**

**ZIP 29209**

07/29/2025

036B 0011813929

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

JUL 31 2025

SC Court of Appeals

29201-376999

