

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master In Equity

Joseph M. Strickland, Master in Equity

RECEIVED

AUG 07 2025

SC Court of Appeals

Case No. 2024 – 000917

Former Case No. 2022-cp-4002905

US BANK TRUST
NATIONAL ASSOCIATION,

Respondent,

v.

Angela T Franks,

Appellant,

NOTICE OF OBJECTION TO RESPONDENT'S REQUEST FOR 30 DAY EXTENSION TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER OF RESPONDENT

August 07, 2025



Angela T Franks
Post Office Box 983
Columbia, SC 29202
803-466-3005

Other Counsel of Record:
Dean Hayes
McMicheal Taylor Gray
J. Pamela Price
January Taylor
Brian Lawrence Campbell
John P Fetner

RECEIVED

AUG 07 2025

SC Court of Appeals

IN THE SOUTH CAROLINA COURT OF APPEALS

Angela Franks, Appellant

Case No: 000917

v.

US BANK TRUST NATIONAL

NOTICE OF OBJECTION TO

NATIONAL ASSOCIATION, Respondent

RESPONDENT'S REQUEST

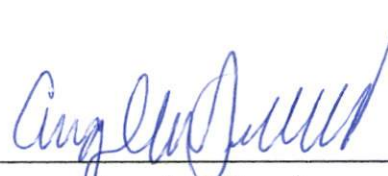
COMES NOW the Appellant, Angela Franks, and respectfully objects to the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter of Respondent, and in support thereof states the following:

- The Respondent's motion is untimely. The request for an extension is being made after the expiration of the applicable deadline set by the South Carolina rules of Appellate Procedure (SCACR), which renders it procedurally improper.
- Respondent has failed to demonstrate good cause or excusable neglect as required by SCACR Rule 263(b), to justify an extension after the deadline has lapsed.
- Granting Respondent additional time would cause undue delay and prejudice Appellant's (pro se litigant) right to a timely resolution of this matter. The appellate process is already governed by strict deadlines to ensure judicial efficiency.
- Respondent's request appears to be part of a pattern of delay and avoidance (Respondent has failed to address the merits of the case). Such conduct undermines the integrity of the appellate process and wastes judicial resources.

- Respondent's failure to timely act within the deadline has waived Respondent's right to file the document, or make the requested action under the South Carolina appellate rules.
- The Respondent has failed to attach an affidavit or competent evidence establishing excusable neglect or justification for the delay, as required under Rule 263(d)

It is not in the interest of justice or judicial economy to reward a party's inaction or lack of diligence by granting extensions beyond rule-based deadlines. Appellant respectfully request this court to deny Respondent's request for 30-day extension of time, and grant Appellant relief sought in this matter by dismissing Respondent's case and ruling in favor of Appellant.

August 07, 2025



Angela T Franks
Post Office Box 983
Columbia, SC 29202
803-466-3005

Other Counsel of Record:
Dean Hayes
McMicheal Taylor Gray
J. Pamela Price
January Taylor
Brian Lawrence Campbell
John P Fetner

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Master In Equity

Joseph M. Strickland, Master in Equity

RECEIVED

AUG 07 2025

Case No. 2024 – 000917

SC Court of Appeals

US BANK TRUST
NATIONAL ASSOCIATION,

Respondent,

v.

Angela T Franks,

Appellant,

PROOF OF SERVICE

I certify that I have served the Notice of Objection to Respondent's request for 30 Day Extension to File Initial Brief and Designation of Matter of Respondent on All parties by depositing a copy of it in the United States Mail, postage prepaid, on August 04, 2025, address to their attorney(s) of record Dean Hayes 4500 Fort Jackson Blvd, Suite 335, Columbia, SC 29209.

August 07, 2025



Angela T Franks
Post Office Box 983
Columbia, SC 29202