

THE STATE OF SOUTH CAORLINA
In The Court of Appeals

70207

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr. Circuit Court Judge

Case No. 2010-CP-08-1707

Appellate Case No. 2013-001531

HSBC Mortgage Corporation, USA,.....Appellant,

v.

Frederick J. Otterbein, IV a/k/a Frederick John Otterbein, IV,
Heather H. Otterbein, and First Federal Savings and Loan Association a/k/a
First Federal Saving and Loan Association of Charleston.....Defendants,

Of Whom

Frederick J. Otterbein, IV a/k/a Frederick John Otterbein, IV
and Heather H. Otterbein, are.....Respondents.

NOTICE OF MOTION AND MOTION
FOR AN EXTENSION OF TIME TO
FILE INITIAL BRIEF OF THE
RESPONDENTS

The Respondents, Frederick J. Otterbein, IV and Heather H. Otterbein, by and through their undersigned counsel, hereby move before this Court for an order granting Respondents a thirty (30) day extension of time, or until December 2, 2013, in which to file the Respondents' Initial Brief.

Prior to filing for said relief counsel for Respondents consulted with counsel for Appellant and obtain counsel for Appellant's consent to the request for an extension of time.

RESPECTFULLY SUBMITTED,

RECEIVED

OCT 28 2013

SC Court of Appeals

[SIGNATURE BLOCK TO FOLLOW]

MARY LEIGH ARNOLD, PA



Mary Leigh Arnold
749 Johnnie Dodds Blvd., Suite B
Mt. Pleasant, SC 29464
Phone: 843-971-6053
Facsimile: 843-971-6055
sammie@maryarnoldlaw.com
Attorney for Respondent

October 27, 2013
Mt. Pleasant, SC

THE STATE OF SOUTH CAORLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable R. Markley Dennis, Jr. Circuit Court Judge

Case No. 2010-CP-08-1707

Appellate Case No. 2013-001531

HSBC Mortgage Corporation, USA,.....Appellant,

v.

Frederick J. Otterbein, IV a/k/a Frederick John Otterbein, IV,
Heather H. Otterbein, and First Federal Savings and Loan Association a/k/a
First Federal Saving and Loan Association of Charleston.....Defendants,

Of Whom

Frederick J. Otterbein, IV a/k/a Frederick John Otterbein, IV
and Heather H. Otterbein, are.....Respondents.

PROOF OF SERVICE

I certify that on this 21 day of October, 2013, I have served the Respondents Notice of Motion and Motion for an Extension of Time to File the Initial Brief of the Respondents, by depositing a copy of the same in the United States Mail postage pre-paid, addressed as follows:

Robert H. Jordan
Merritt G. Abney
NELSON MULLINS RILEY & SCARBOROUGH LLP
P.O. Box 1806 (29402)
Charleston, SC 29401
Attorney for Appellant

RESPECTFULLY SUBMITTED,

[SIGNATURE BLOCK TO FOLLOW]

MARY LEIGH ARNOLD, PA

Mary Leigh Arnold
749 Johnnie Dodds Blvd., Suite B
Mt. Pleasant, SC 29464
Phone: 843-971-6053
Facsimile: 843-971-6055
sammie@maryarnoldlaw.com
Attorney for Respondent

MARY LEIGH ARNOLD P.A.

Attorney and Counselor at Law

October 23, 2013

The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1015 Sumter Street
P.O. Box 11629 (29211)
Columbia, SC 29201

749 Johnnie Dodds Blvd
Suite B
Mount Pleasant, South Carolina
29464
T 843 971 6053
F 843 971 6055
Sammie@maryarnoldlaw.com

**RE.: HSBC Mortgage Corporation, USA v. Frederick J. Otterbein, et al.
App. Case No.: 2013-001531**


Dear Ms. Kitchings:

Please find enclosed with regard to the above referenced matter the following:

1. An Original Notice of Motion and Motion for an Extension of Time to File the Initial Brief of the Respondent;
2. A Proof of Service of the Motion;
3. A corresponding check for the motion.

I thank you in advance for your consideration.

MARY LEIGH ARNOLD, PA


Mary Leigh Arnold

Enclosures:
(as stated)
CC:
Merritt G. Abney

RECEIVED

OCT 28 2013

SC Court of Appeals