

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ORANGEBURG COUNTY OF COMMON PLEAS

The Hon. Martin R. Banks, Special Referee

Case No.: 2015-CP-38-00581

Appellate Case No.: 2025-002277

106785

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DEC 23 2025

SC Court of Appeals

Deutsche Bank National Trust Co., )  
 )  
Respondent, )  
 )  
v. )  
 )  
Betti Abrecht and William Abrecht, )  
 )  
Appellants. )

**NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME TO SUBMIT  
TRANSCRIPT FROM HEARING ON MOTION FOR RECONSIDERATION AND FOR  
THE FILING OF APPELLANTS' INITIAL BRIEF AND DESIGNATION OF MATTERS TO  
BE INCLUDED IN THE RECORD ON APPEAL**

PLEASE TAKE NOTICE that Appellants Betti Abrecht and William Abrecht ("Appellants") will move this Court upon the Affidavit of their counsel, William B. Jung, Esq., sworn to December 19, 2025, pursuant to Rules 207, 224 and 234(b) of the South Carolina Rule of Appellate Procedure for an extension of 30 days to extend the time for Appellant's filing of their Initial Brief and Designation of Matters to be Include in the Record on Appeal. The grounds for this Motion are that Appellants' counsel was under the mistaken belief that the transcript to the hearing on Appellants' Motion for Reconsideration before the trial court had been previously ordered. Upon discovery that

this transcript had not been obtained, counsel for Appellants ordered this transcript on December 18, 2025 and is advised it may take up to 10-15 business days to be produced.

On a separate ground, the Appellants' Initial Brief and Designation of Matters to be included in the Record on Appeal are presently due on January 6, 2025. Given this timetable which falls contemporaneous to travel and personal commitments over Holiday Season, Appellants' counsel respectfully requests the current briefing schedule be extended by thirty (30) days. This is Appellants' first request for an extension of time.

**WHEREFORE**, Appellants pray for an Order extending by 30 days the time for the filing of their Initial Brief and Designation of Matters to be Included in the Record on Appeal.

Respectfully submitted,

Dated: Mount Pleasant, S.C.  
December 19, 2025

WILLIAM B. JUNG, ESQ.



William B. Jung, Esq.  
(S.C. Bar No. 0068788)  
1156 Bowman Road, Ste. 200  
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Attorney for the Appellants

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Case No.: 2015-CP-38-00581

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Deutsche Bank National Trust Co.,     )  
  )  
                  Respondent,                    )  
  )  
v.    )  
  )  
Betti Abrecht and William Abrecht,     )  
  )  
\_\_\_\_\_  
                  Appellants.                    )

**AFFIDAVIT IN SUPPORT OF MOTION FOR EXTENSION OF TIME**

STATE OF SOUTH CAROLINA    )  
  ) ss.:  
COUNTY OF CHARLESTON     )

**WILLIAM B. JUNG, ESQ.**, being duly sworn, deposes and says:

1. I am an attorney admitted to practice before this Court and am counsel to Appellants Betti Abrecht and William Abrecht. I have personal knowledge of the following averments, which I represent are true and correct statements of fact. I submit this Affidavit in support of Appellants' Motion for an extension of time.

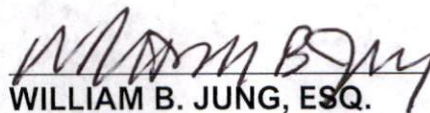
2. I was retained by the Appellants to argue a Motion for Reconsideration. Besides this Motion, there was a number of hearings on a Motion to set

an Appeal Bond as a condition for staying a foreclosure sale of the Appellants' residence during the pendency of this Appeal.

3. Before late Wednesday, December 17, 2025, I believed that I had ordered the transcript for the hearing on the Motion for Reconsideration. The Transcript for the underlying trial of this action on April 17, 2025 has already been filed. After speaking with Clerk's Office to confirm the filing deadlines, I discovered that this Motion for Reconsideration hearing transcript had not been ordered. I ordered that transcript on December 18, 2025 and I am advised that it may take between 10 to 15 business days to obtain this transcript from the Reporter. Not having this transcript contemporaneous to the preparation of Appellants' Initial Brief will be prejudicial to the Appellants.

4. As additional grounds for an extension, given the current filing deadline of January 6, 2026 falling immediately after the undersigned commitments over the Holidays season, the undersigned requires an extension of time to make the necessary filings. No prior request for an extension of time has been made.

**WHEREFORE**, Appellants pray for an Order extending by 30 days the time for the filing of their Initial Brief and Designation of Matters to be Included in the Record on Appeal.

  
WILLIAM B. JUNG, ESQ.

Sworn to before me this 19th  
Day of December, 2025.

  
Notary Public  
My Commission Expires: 4/15/2035

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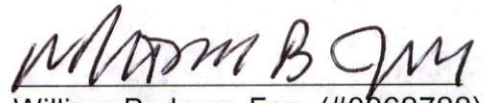
Deutsche Bank National Trust Co.,	)
	)
Respondent,	)
	)
v.	)
	)
Betti Abrecht and William Abrecht,	)
	)
Appellants.	)

**PROOF OF SERVICE OF MOTION FOR EXTENSION OF TIME**

I, William B. Jung, Esq., counsel for Appellants, certify under penalty of perjury that on December 19, 2025, I served a copy of Appellants' Motion for an extension of time by mailing a true copy thereof to the counsel for the Respondents emailing a true and complete copy to:

- Brook Dangerfield, Esquire
- Jane Harris Downey, Esquire
- Michael Casin Griffin, Esquire
- Louise Myers Johnson, Esquire
- John Sanford Kay, Esquire
- George Benjamin Milam, Esquire
- Alan Martin Stewart, Esquire 2
- Gregory Thomas Whitley, Esquire
- Kenneth Gregory Wooten,

Dated: December 19, 2025

A handwritten signature in black ink, appearing to read "William B. Jung". The signature is written in a cursive, somewhat stylized font.

William B. Jung, Esq. (#0068788)

1156 Bowman Road, Ste. 200

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Attorney for Appellants

ADMITTED  
SOUTH CAROLINA  
NEW YORK

**WILLIAM B. JUNG, ESQ.**

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December 19, 2025

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, S.C. 29211

Re: Deutsche Bank Trust v. Abrecht  
Appellate Case No.: 2025-002277

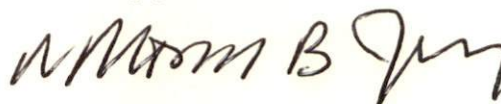
Dear Madame Clerk:

I represent the Appellants Betti and William Abrecht on the above Appeal and who are filing a Motion for Extension of Time to obtain a Transcript and extend the briefing schedule.

I enclose original and six copies of this Motion any my check for the \$50.00 Motion filing fee.

Kindly please file the same. Thank you for your courtesy.

Sincerely yours,



William B. Jung

WBJ:wbj  
Encl.  
cc. Attached Service List



WILLIAM B. JUNG, ESQ.  
BOWMAN CENTER  
1156 BOWMAN ROAD, STE. 200  
MOUNT PLEASANT, SC 29464

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