

**THE STATE OF SOUTH CAROLINA**  
In the Court of Appeals

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**APPEAL FROM RICHLAND COUNTY**  
Master-In-Equity  
Joseph M. Strickland, Master in Equity

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Case No. 2024 – 000917

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**US BANK TRUST**  
NATIONAL ASSOCIATION,  
Respondent,

**RECEIVED**  
FEB 25 2026  
SC Court of Appeals

v.

**Angela T. Franks,**  
Appellant,

**APPELLANT'S MOTION FOR LEAVE TO SERVE AND FILE REPLY  
BRIEF OUT OF TIME**

February 25, 2026

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

**Other Counsel of Record:**

McMicheal Taylor Gray  
J. Pamela Price  
January Taylor  
Brian Lawrence Campbell  
John P. Fetner

Appellant, **Angela T. Franks**, pro se, respectfully moves this Court for leave to serve and file her Reply Brief out of time, and in support thereof shows:

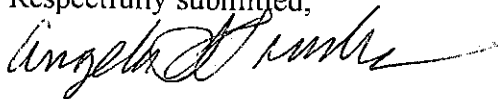
1. Respondent served its brief, and Appellant thereafter prepared a reply brief in response.
2. By letter dated **February 19, 2026**, the Clerk of the South Carolina Court of Appeals advised Appellant that the Court had received Appellant's reply brief on **February 13, 2026**, but that Appellant must file a motion requesting permission to serve and file the reply brief out of time, and that the Court would not consider the reply brief unless such motion was filed within ten (10) days of the Clerk's letter.
3. Appellant respectfully submits that good cause exists for the requested relief.
4. During the relevant time period, court operations and/or access were impacted by **inclement weather closures** (including one or more days of court closure or disruption), which affected Appellant's ability to timely coordinate filing and follow-up.
5. The relevant period also included the **Presidents Day holiday**, which further reduced available court/business days for communications and filing coordination.
6. In addition, Appellant became aware that the Court had been using an **incorrect email address** for communications to Appellant, which materially impaired Appellant's ability to receive timely notice and respond promptly.
7. Appellant has acted in good faith and with diligence upon learning of the issue and the Court's directive.
8. The delay was not willful, was not for purposes of delay, and Respondent will not be unfairly prejudiced by the Court's acceptance of the Reply Brief.
9. Appellant respectfully requests that the Court accept the Reply Brief for filing and consider it in this appeal.

**WHEREFORE,**

Appellant respectfully requests that this Court enter an Order:

1. Granting Appellant leave to serve and file the Reply Brief out of time;
2. Accepting Appellant's Reply Brief for filing; and
3. Granting such other and further relief as the Court deems just and proper.

Respectfully submitted,



**Angela T. Franks**, Appellant, pro se  
P.O. Box 983  
Columbia, SC 29202  
(803) 466-3005  
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Dated: February 25, 2026

## CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing **Appellant's Motion for Leave to Serve and File Reply Brief Out of Time** upon counsel of record by U.S. Mail and/or authorized electronic service on this 25th day of February, 2026.

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