

STATE OF SOUTH CAROLINA
In The Court of Appeals

S. Jackson Kimball, Special Circuit Court Judge

Case No. 2012-CP-20-03040

170738

DEUTSCHE BANK NATIONAL TRUST COMPANY
as Trustee for J.P. Morgan Mortgage Acquisition Trust
2007-CH1, Asset Backed Pass Through Certificates,
Series 2007-CH1, Respondent,

vs.

CORA B. WILKS,
DAVID C. WILKS,
CHASE BANK, N.A., and
MIDLAND FUNDING, LLC,

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SC Court of Appeals

of whom
CORA B. WILKS and
DAVID C. WILKS are Appellants.

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellants, by their counsel herein, move this Court for an order granting them an extension of time in which to file their Initial Brief and Designation of Matter to be included in the Record on Appeal, on the grounds stated below:

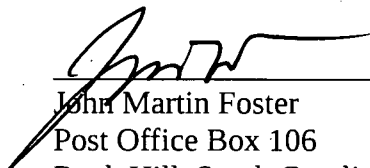
1. By receipt of the Order of this Court, the Appellants' Initial Brief and Designation of Matter to be included in the Record is due as of December 16th, 2013.
2. Due to the press of business, counsel for Appellants has been unable to complete that their Initial Brief and Designation of Matter to be included in the Record on Appeal.
3. Counsel believes the same can be filed, without further delay, within thirty (30) days, that is: on or before Wednesday, January 15th, 2014.

The basis of this Motion is the within-cited Rule, the records of this appeal, and any attached

affidavit or stipulation of the undersigned, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellants herein move this Court for an extension of time with which to file their Initial Brief and Designation of Matter, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

February 3, 2012



John Martin Foster
Post Office Box 106
Rock Hill, South Carolina 29731
803 324-8100
Attorney for Appellants

Other Counsel of Record:

Michael J. Anzelmo
Benjamin Rush Smith, III
Nelson Mullins Riley & Scarborough, LLP
Attorneys for Deutsche Bank
Post Office Box 11070
Columbia, S.C. 29211
803 255-9312

Wylie Westmoreland Clarkson
Korn Law Firm, PA
Attorneys for Midland Funding, LLC
Post Office Box 12369
Columbia, S.C. 29211
803 252-5817

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DEUTSCHE BANK NATIONAL TRUST COMPANY
as Trustee for J.P. Morgan Mortgage Acquisition Trust
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vs.

CORA B. WILKS,
DAVID C. WILKS,
CHASE BANK, N.A., and
MIDLAND FUNDING, LLC,

of whom
CORA B. WILKS and
DAVID C. WILKS are Appellants.

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PROOF OF SERVICE


I certify that I have served the Motion for Extension of Time dated December 16, 2013, on the following counsel or persons of record:

Michael J. Anzelmo
Benjamin Rush Smith, III
Nelson Mullins Riley & Scarborough, LLP
Attorneys for Deutsche Bank
Post Office Box 11070
Columbia, S.C. 29211

Wylie Westmoreland Clarkson
Korn Law Firm, PA
Attorneys for Midland Funding, LLC
Post Office Box 12369
Columbia, S.C. 29211

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262, S.C.A.C.R.

December 16, 2013


John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellants

JOHN MARTIN FOSTER

Attorney at law

The Guardian Building	PO Box 106	803 324 8100
223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfooster@comporium.net

December 16, 2013

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Deutsche Bank National Trust Company, Respondent
v. Cora B. Wilks and David C. Wilks, Appellants
Docket No. 12-CP-46-03040

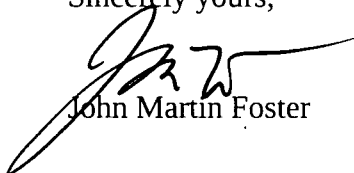
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellants' Motion for Extension of Time, together with Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorney for the Appellant with a copy of the said Motion, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely yours,



John Martin Foster

jmf/
enclosures
cc: Client File

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Nelson Mullins Riley & Scarborough, LLP
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Columbia, S.C. 29211
803 255-9312

Wylie Westmoreland Clark
Korn Law Firm, PA
Attorneys for Midland Funding, LLC
Post Office Box 12369
Columbia, S.C. 29211
803 252-5817

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