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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS
APPEAL FROM RICHLAND COUNTY
Joseph M. Strickland, Master-in-Equity

RECEIVED
JUL 22 2026
SC Court of Appeals

Appellate Case No. 2024-000917

U.S. Bank Trust National Association, as Trustee of Tiki Series IV
Trust,

Respondent,

v.

Angela T. Franks aka Angela Thomansina Franks and CMS
Roofing, LLC, Defendants,
Of which Angela T. Franks aka Angela Thomansina Franks is the
Appellant.

Appellant.

**APPELLANT'S MOTION FOR EXTENSION OF TIME AND FOR LEAVE TO SERVE
AND FILE THE SECOND AMENDED RECORD ON APPEAL OUT OF TIME**

Appellant Angela T. Franks, proceeding pro se, respectfully moves pursuant to Rules 240 and 263(b), SCACR, for an extension of time through and including August 21, 2026 to serve and file the Second Amended Record on Appeal required by the Court's Order filed July 2, 2026. To the extent the original ten-day period has expired, Appellant also requests leave to complete the act out of time. This motion is limited to the Second Amended Record on Appeal and does not request alteration of any other deadline.

FACTUAL AND PROCEDURAL GROUNDS

1. On July 2, 2026, the Court struck the amended Record on Appeal filed May 13, 2026 and ordered Appellant to serve and file, within ten days, a Second Amended Record on Appeal containing an accurate index, all matter designated by the parties, and no matter not presented to the circuit court.

2. The July 2 Order further directs that the Second Amended Record comply with Rule 210(c), SCACR, including the required order of documents, complete copies of included orders and pleadings, and consecutive pagination beginning with the index.
3. The source materials presently available to Appellant exceed 300 pages and contain a mixture of lower-court documents, appellate correspondence, bankruptcy materials, documents from a prior foreclosure action, and exhibits whose presentation to the lower court must be verified before inclusion.
4. Both parties served detailed designations of matter. Respondent designated more than thirty categories of documents, including multiple stay and restore motions and orders, notices of hearing, affidavits, loan documents, a motion to dismiss, and a record of hearing. Appellant must locate complete copies, identify the exact beginning and ending page of each document, and confirm each document was presented to or filed in the lower court.
5. Appellant must also remove appellate-court correspondence and other material that was not presented to the lower court, while preserving every properly designated and relevant lower-court document. This is a document-by-document verification task, not merely repagination of the previously filed record.
6. There is no conventional transcript of the May 14, 2024 hearing. Appellant must therefore carefully verify the status and proper inclusion of any designated record of hearing without adding appellate materials that Rule 210(c) excludes.
7. Rule 210(g), SCACR, provides that filing the Record on Appeal constitutes a certification that the Record contains all material proposed by the parties and no other material. Appellant seeks sufficient time to make that certification accurately and in good faith.

8. Appellant has been diligently reviewing the source packet, the parties' designations, and the Court's July 2 Order. The delay is not willful and is not sought for purposes of delay. Appellant contacted the Clerk's office on July 22, 2026 and was advised that she could submit a motion requesting additional time.
9. Respondent will not be prejudiced by the requested extension. The July 2 Order affords Respondent ten days after receipt of the Second Amended Record on Appeal to file its final brief, so Respondent's briefing period will begin only after service of the corrected record.
10. A thirty-day extension through August 21, 2026 is reasonably necessary to obtain or verify missing lower-court documents, compile an accurate index, exclude improper material, assemble complete documents in Rule 210(c) order, paginate the Record, and serve all parties.

MEMORANDUM OF AUTHORITIES

Rule 240(a), SCACR, expressly governs motions for extension of time. Rule 240(c) requires a written motion stating the grounds, a certificate of service, a supporting memorandum of authorities, and supporting affidavits or documents when the facts relied upon are outside the Record on Appeal.

Rule 263(b), SCACR, authorizes the appellate court, or any judge or justice thereof, to extend the time prescribed by the appellate rules for performing any act other than service of a notice of appeal. The requested extension concerns preparation of the Second Amended Record on Appeal and therefore falls within the Court's authority under Rule 263(b).

Rule 210(c), SCACR, requires the Record on Appeal to include all matter designated under Rule 209, exclude matter not presented below, arrange documents in a prescribed order, include complete copies of included orders and pleadings, and number pages consecutively

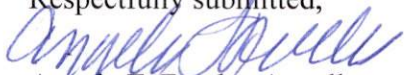
beginning with the index. Rule 210(g) makes filing the Record a certification that it contains all designated material and no other material. The volume and mixed character of the source documents, together with the need to verify lower-court presentation and completeness, constitute good cause for the requested extension.

REQUEST FOR RELIEF

WHEREFORE, Appellant respectfully requests that the Court:

- (a) grant Appellant an extension through and including August 21, 2026 to serve and file the
Second Amended Record on Appeal;
- (b) to the extent the original deadline has expired, grant leave to serve and file the Second
Amended Record on Appeal out of time;
- (c) confirm that Respondent's ten-day period to serve and file its final brief will run from receipt
of the Second Amended Record on Appeal, as provided in the July 2, 2026 Order; and
- (d) grant 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

Telephone: (803) 466-3005

Dated: July 22, 2026

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PROPOSED ORDER

This matter is before the Court on Appellant Angela T. Franks's Motion for Extension of Time and for Leave to Serve and File the Second Amended Record on Appeal Out of Time. After consideration of the motion and supporting affidavit, the Court finds good cause for the requested relief.

IT IS ORDERED that the motion is GRANTED. Appellant shall serve and file the Second Amended Record on Appeal on or before August 21, 2026. Respondent's period for serving and filing its final brief shall run from receipt of the Second Amended Record on Appeal as provided in the Court's July 2, 2026 Order.

IT IS SO ORDERED.

Judge, South Carolina Court of Appeals

Date: _____

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2026, I served a true and correct copy of the foregoing Appellant's Motion for Extension of Time and for Leave to Serve and File the Second Amended Record on Appeal Out of Time, including the supporting affidavit and proposed order, upon all counsel of record by depositing copies in the United States Mail, first-class postage prepaid, and by authorized electronic service where applicable, addressed as follows:

Mr. Brian Lawrence Campbell, Esquire
2840 S. College Road, Suite 451
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Angela T. Franks
Appellant pro se

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