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Oct 15 2026

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Berkeley County
Court of Common Pleas

Thomas J. Rode, Circuit Court Judge

Appellate Case No. 2026-001046
Circuit Court Case No. 2025-CP-08-01090

Shaunise Nelson,

Appellant,

v.

Ally Financial Inc., Herbie's Towing Service, and Hook & Book Recovery SC,
LLC,

Defendants,

of which Ally Financial Inc. and Hook & Book Recovery SC, LLC, are the,

Respondents.

**MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF
RESPONDENT HOOK & BOOK RECOVERY SC, LLC**

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Graydon V. Olive, IV (SC Bar No.: 105319)
William A. Dennis, Jr. (SC Bar No.: 106308)
Clement Rivers, LLP
Post Office Box 993
Charleston, SC 29402-0993
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Attorneys for Hook & Book Recovery SC, LLC

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COMES NOW Respondent, Hook & Book Recovery SC, LLC, by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of thirty (30) days' additional time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(2), the deadline for Respondent's initial brief and designation of matter is October 30, 2026. On account of work-related and other time commitments, Respondent respectfully requests this deadline be extended by 30 days. Respectfully, Respondent believes this relief is consistent with the interests of justice and will not work any undue prejudice upon the other parties.

WHEREFORE, Respondent moves this Honorable Court to grant it an additional extension of 30 days' time to file/serve its initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving its initial brief and designation of matter would be November 30, 2026,¹ according to the undersigned's calculations. Further, Respondent respectfully requests the Court hold the present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

[Signed on next page]

¹ Calculating the 30-day period from October 30, 2026 in accordance with Rule 263(a), SCACR, it runs until Monday, November 30, 2026, because the 30th day is Sunday, November 29, 2026.

[Signature page for Motion for Extension of Time to File/Serve Initial Brief of Respondent Hook & Book Recovery SC, LLC, Appellate No. 2026-001046]

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Graydon V. Olive, IV
CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Charleston, South Carolina

October 15, 2026

**THE STATE OF SOUTH CAROLINA
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Thomas J. Rode, Circuit Court Judge

Appellate Case No. 2026-001046
Circuit Court Case No. 2025-CP-08-01090

Shaunise Nelson,

v.

Ally Financial Inc., Herbie's Towing Service, and Hook & Book Recovery SC,
LLC,

of which Ally Financial Inc. and Hook & Book Recovery SC, LLC, are the,

Appellant,

Defendants,

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Hook & Book Recovery SC, LLC

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SC Court of Appeals

I, Graydon V. Olive, IV, of Clement Rivers, LLP, attorneys for Respondent Hook & Book Recovery SC, LLC, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT HOOK & BOOK RECOVERY SC, LLC** was served on all other parties to this appeal on October 15, 2026, via email (see attached) to their following counsel of record and via US Mail to Ms. Nelson:

Shaunise Nelson
PO Box 103
Ridgeville, SC 29472
Shaunise.nelson@gmail.com

Pro Se Appellant

and

George Benjamin Milam, bmilam@bradley.com
Noah Riley Matthews, nmatthews@bradley.com
Bradley Arant Boult Cummings, LLP

Attorneys for Ally Financial Inc.

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Graydon V. Olive, IV
Graydon V. Olive, IV (SC Bar No. 105319)
Attorneys for Hook & Book Recovery SC, LLC

Charleston, South Carolina

October 15, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Thursday, October 15, 2026 7:33 AM
To: 'Shaunise.nelson@gmail.com'; 'bmilam@bradley.com'; 'nmatthews@bradley.com'
Cc: Brown, Stephen L.; Olive, IV, Graydon; (Billy) William Dennis, Jr.
Subject: Appeal 2026-001046 – Nelson v. Ally Financial – CR250508 – Motion
Attachments: Nelson - Motion.pdf; Ltr to Nelson w Motion.pdf

Attached for service on you in the above-referenced matter, please find a Motion for Extension of Time to File/Serve Initial Brief of Respondent Hook & Book Recovery SC, LLC. A paper copy is also being mailed to Ms. Nelson.

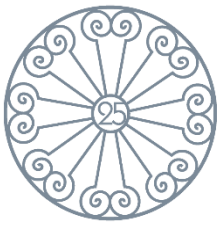
Thank you,

Aimee Justman
Paralegal and Group Coordinator
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ATTORNEYS AT LAW

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October 15, 2026

Shaunise Nelson
PO Box 103
Ridgeville, SC 29472

Re: Shaunise Nelson v. Ally Financial, Inc., Herbie's Towing Service, and Hook & Book Recovery SC, LLC
Appeal Case No.: 2026-001046
Underlying Case No.: 2025-CP-08-01090
Claim No.: 330142
YCR File: 7922-20250508

Dear Shaunise:

Enclosed please find a copy of Respondent Hook & Book Recovery SC, LLC's Motion for Extension of Time to File/Serve Initial Brief, which was electronically filed on October 15, 2026.

With best wishes and kindest regards, I am

Sincerely,

CLEMENT RIVERS, LLP

Graydon V. Olive, IV
Associate

GVO/amj
Enclosure