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Oct 28 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
The Honorable Thomas J. Rode, Circuit Court Judge

Appellate Case No. 2026-001046
Circuit Court Case No. 2025CP0801090

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 RESPONDENT'S INITIAL BRIEF AND ASSOCIATED DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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Attorneys for Respondent Ally Bank

Respondent Ally Bank ("Respondent"), erroneously sued in this action as Ally Financial Inc., through undersigned counsel and pursuant to SCACR 263(b), hereby seeks an extension of time through and including December 1, 2026 to file its Initial Brief and accompanying Designation of Matter to be Included in the Record on Appeal, and states as follows:

1. Appellant, Shaunise Nelson, served her Initial Brief and Designation of Matter to be Included in the Record on Appeal on September 30, 2026. Pursuant to Rules 208(a)(2) and

209(a), Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal are due October 30, 2026.

2. Respondent obtained a copy of the transcript in the underlying proceeding on October 19, 2026.

3. Due to responsibilities in other matters that undersigned counsel is handling, Respondent needs additional time to prepare and file its Initial Brief and accompanying Designation of Matter to be Included in the Record on Appeal.

4. The Court has extended the time for Hook & Book Recovery SC, LLC to file its initial brief and designation of matter until December 1, 2026, pursuant to its order dated October 16, 2026. A like extension for Respondent would align the briefing schedule for both parties.

5. Appellants believe there is good cause to grant the requested extension.

6. This is Appellants' first request for an extension of this deadline.

WHEREFORE, Respondent, Ally Bank respectfully requests an extension of time through and including December 1, 2026 to file its Initial Respondent's Brief and accompanying Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted this the 28th day of October, 2026.

/s/ G. Benjamin Milam

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PROOF OF SERVICE

I hereby certify that a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENTS' INITIAL BRIEF AND ASSOCIATED DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** was sent via e-mail and via first-class U.S. Mail, postage prepaid, and addressed as follows:

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This the 28th day of October, 2026.

/s/ G. Benjamin Milam
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