

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Master-in-Equity

The Honorable Mikell Scarborough

Case No. 2011-CP-10-2505

Appellate Case No. 2013-002175

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30 Court of Appeals

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Wells Fargo Bank, N.A., as trustee for WaMu
Mortgage Pass-Through Certificates Series 2006-PR I
Trust, Respondent,

v.

Marvin Smalley, Bay Club Homes Property Owners
Association, Inc., Defendants

Of Whom Marvin Smalley is Appellant.

Motion for an Extension of Time


Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, Respondent Wells Fargo Bank, N.A., as trustee for WaMu Mortgage Pass-Through Certificates Series 2006-PR I Trust (“Wells Fargo”), moves this Court for an order granting a thirty (30) day extension of time to file its Initial Respondent’s Brief and Designation of Matters in the above-captioned appeal. This is Wells Fargo’s second extension request. No party will be prejudiced by this extension.

Per order of this Court dated December 18, 2013, Wells Fargo’s Initial Respondent’s Brief and Designation of Matters are due on February 3, 2014. The new deadline, after this 30 day extension, would be March 5, 2014.

The extension is necessitated due to other conflicting deadlines, work obligations, hearings, and previously scheduled oral arguments, including advance preparation for same. Such conflicts prevent undersigned counsel from completing Wells Fargo's Initial Respondent's Brief and Designation of Matters within the current deadline.

Therefore, Wells Fargo moves this Court to extend the deadline for its Initial Respondent's Brief and Designation of Matters until March 5, 2014. Wells Fargo asks that the current deadline be held in abeyance pending the Court's resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Columbia, South Carolina

January 28, 2013

THE STATE OF SOUTH CAROLINA
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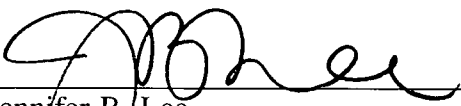
I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Wells Fargo Bank, N.A., as trustee for WaMu Mortgage Pass-Through Certificates Series 2006-PR I Trust, do hereby certify that I have served all parties in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid and hand delivery, to the following address(es):

Pleadings:

Motion for an Extension of Time

Counsel Served:

David K. Haller, Esq.
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Jennifer B. Lee
Administrative Assistant

January 28, 2014

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January 28, 2014

JS Mail *change made for court closure for snow*
Hand-Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

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JAN 30 2014
SC Court of Appeals

RE: Wells Fargo Bank, et al. v. Marvin Smalley, et al.
Case No.: 2011-CP-10-2505
Appellate Case No. 2013-002175
Our file no.: 11281/01800

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of a Motion for Extension of Time in the above-referenced matter. Please file the original and return a clocked-in copy to me via our courier. Should you have any questions, please do not hesitate to contact me.

By copy of this letter, I am hereby serving opposing parties.

Very truly yours,



Michael J. Anzelmo

MJA:jlee
Enclosures

cc: David K. Haller, Esq.

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The Honorable Jenny Abbott Kitchings

Clerk of Court

SC Court of Appeals

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