

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM NEWBERRY COUNTY
Court of Common Pleas
Joseph W. Hudgens, Special Referee

Appellate Case No. 2013-002181

RECEIVED
APR 15 2014
SC Court of Appeals
71883

EverBank.....Respondent,

v.

Lenora Scurry, Patrick Scurry,
The South Carolina Department of Revenue,..... Defendants,

Of whom Lenora Scurry and Patrick Scurry are the..... Appellants.

RESPONDENT'S SECOND MOTION FOR EXTENSION OF TIME

Sean M. Foerster (SC Bar # 77466)
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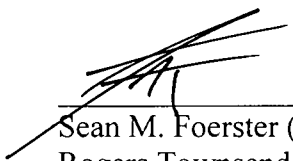
Attorneys for Respondent EverBank

April 15, 2014

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Respondent EverBank, ("EverBank") hereby moves for an extension of time to file and serve its Initial Brief of the Respondent and Designation of Matter to be Included in the Record on Appeal due to counsel's heavy workload. The present deadline for service and filing of Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal is April 18, 2014. Appellants' counsel consents to the extension sought. Respondent's counsel believes that there is good cause to grant the requested extension to May 2, 2014.

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal for an additional fourteen days, to May 2, 2014.



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Attorneys for Respondent Everbank

April 15, 2014

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PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Motion for Extension of Time on April 15, 2014, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

Andrew S. Radeker, Esquire
Harrison & Radeker, P.A.
P. O. Box 50143
Columbia, South Carolina 29250



Tabitha D. Scott
Paralegal to Sean M. Foerster, Esquire
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APR 15 2014

SC Court of Appeals

April 15, 2014

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

RE: *EverBank vs. Lenora Scurry, Patrick Scurry and The South Carolina Department of Revenue*
Appellate Case # 2013-002181
Our File # 20576-2

Dear Ms. Kitchings:

Enclosed are the original and seven copies of Respondent's Second Motion for Extension of Time to file Initial Brief and Designation of Matter to be Included in the Record on Appeal and a Proof of Service in reference to the above matter, along with a check in the amount of \$25.00.

By copy of this correspondence, I am serving a copy of this motion on opposing counsel.

Please return a filed copy of this document to me with the courier.

Very truly yours,

A handwritten signature in black ink, appearing to be "S.M. Foerster", written over a horizontal line.

Sean M. Foerster

/tds
Enclosure

cc:

Andrew S. Radeker, Esquire
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, SC 29250