

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2011-CP-40-6103

72251

Bank of New York Mellon Trust Company, National
Association f/k/a The Bank of New York Trust
Company, N.A. as successor to JP Morgan Chase Bank
N.A. s/b/m Bank One National Association as Trustee for
RAMP 2002RS5, Plaintiff,

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MAY 21 2014

v.

Chartrease Grier, Palmetto Health Alliance; and Palmetto
Richland Memorial, Defendants,

SC Court of Appeals

Chartrease Grier, Third-Party Plaintiff, Appellant,

v.

Nationwide Property & Casualty Insurance Company;
and Tonya D. Parks, Third-Party Defendants, Respondents.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENTS' INITIAL BRIEF
AND DESIGNATION OF MATTER AND
MOTION FOR A STAY PENDING THE COURT'S RULING**

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules,
Respondents Nationwide Property & Casualty Insurance Company and Tonya D. Parks
move this Court for an Order granting them a thirty (30) day extension of time to file

their initial brief and designation of matter to be included in the record on appeal in the above-captioned case. This is Respondents' second extension request, and no party will be prejudiced by this extension.

Pursuant to this Court's Order dated May 2, 2014, Respondents' initial brief and designation of matter are currently due on May 27, 2014. Respondents respectfully request that this Court grant them a thirty (30) day extension, making their initial brief and designation of matter due on June 26, 2014.

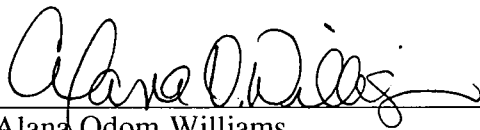
Counsel for Respondents requests this extension due to other case demands and impending deadlines, which prevent undersigned counsel from completing Respondents' initial brief and designation of matter within the current deadline.

Therefore, Respondents move this Court for an Order extending the deadline for their initial brief and designation of matter until June 26, 2014. Respondents further request that this Court hold the current deadlines in abeyance, pending the Court's resolution of this motion.

{Signature on following page}

Respectfully submitted,

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By:  _____

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May 21, 2014

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May 21, 2014

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May 21, 2014

Hand Delivery

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

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MAY 21 2014
SC Court of Appeals

RE: Bank of New York Mellon Trust Company, National Association f/k/a
The Bank of New York Trust Company, N.A. as successor to JP Morgan
Chase Bank N.A. s/b/m Bank One National Association as Trustee
for RAMP 2002RS5, Plaintiff, v. Chartrease Grier, Palmetto Health Alliance;
and Palmetto Richland Memorial, Defendants
Chartrease Grier, Appellant v. Nationwide Property & Casualty Insurance
Company; and Tonya D. Parks, Respondents

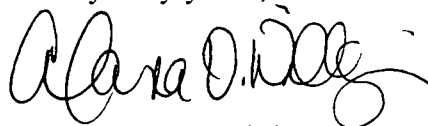
Appellate Case No. 2013-002403
Our File No. 18813/01510

Dear Ms. Kitchings:

Enclosed please find an original and seven copies of a Motion for an Extension of Time to File Respondents' Initial Brief and Designation of Matter 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 counsel.

Very truly yours,



Alana Odom Williams

AJO:jlt
Enclosures

The Honorable Jenny Abbott Kitchings
May 21, 2014
Page 2

cc: M. Allison Moon, Esquire
Sarah Elizabeth Brown, Esquire
Michael Geoffrey Wimer, Esquire