

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

72663

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2011-CP-40-6103

RECEIVED
JUN 27 2014
SC Court of Appeals

Bank of New York Mellon Trust Company,
National Association f/k/a The Bank of New York
Trust Company, N.A. as successor to JPMorgan 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,

v.

Chartrease Grier, Third-Party Plaintiff, Appellant,

v.

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

**MOTION FOR AN EXTENSION OF TIME TO FILE APPELLANT'S
INITIAL REPLY BRIEF**

Appellant, by and through the undersigned attorney, respectfully moves this Court for an Order granting a fifteen (15) day extension of time to file Appellant's Initial Reply Brief in the above-captioned matter. In support of this motion, Appellant will show as follows:

On May 2, 2014, Respondents were granted a thirty (30) day extension to file and serve their initial brief, which extended their deadline to May 27, 2014.

On May 21, 2014, prior to obtaining consent of counsel for Appellant, Respondents filed a second Motion requesting that the previously extended May 27th deadline be extended an additional thirty (30) days. Appellant did not receive a copy of this motion or know of its contents until May 27, 2014, the assumed date for filing and service of Respondents' Initial Brief. On May 28, 2014, Appellant received notice from the Court that on May 27, 2014, an Order was entered extending the time to file and serve Respondents' Initial Brief to June 26, 2014.

Accordingly, the deadline for Appellant's Initial Reply Brief is now expected to fall on July 6, 2014. Due to other case demands, as well as previously scheduled vacation time and the July 12, 2014, due date of M. Allison Moon's baby, it is anticipated that undersigned counsel will be unable to complete Appellant's Initial Reply Brief and designation of matter within the anticipated July 6, 2014 deadline.

WHEREFORE, the Appellant seeks an order of the Court granting an additional fifteen (15) days to file Appellant's Initial Reply Brief and designation of matter, thereby extending the deadline to July 21, 2014.

Respectfully submitted,

MOON LAW FIRM



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M. Allison Moon (SC Bar #73717)
P.O. Box 3785
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Mike G. Wimer, admitted *pro hac vice*
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Attorneys for Appellant, Chartreuse Grier

June 25, 2014
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

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Bank N.A. s/b/m Bank One National Association as
Trustee for RAMP 2002RS5 Plaintiff,

v.

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

v.

Chartrese Grier, Third-Party Plaintiff, Appellant,


v.

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

PROOF OF SERVICE

I, the undersigned paralegal of Moon Law Firm, attorneys for Appellant, do hereby certify that on the 25 day of June, 2014, I served all counsel in this action with a copy of the MOTION FOR AN EXTENSION OF TIME TO FILE APPELLANT'S INITIAL REPLY BRIEF by placing a copy of the same in the U.S. Mail, with due and proper postage affixed thereto, and addressed as follows:

Jay T. Thompson, Esq.
Alana Odom Williams, Esq.
Elizabeth Herlong Brogdon, Esq.
Nelson Mullins Riley & Scarborough, LLP
1320 Main Street/17th Floor
Columbia, SC 29201


Kaitlyn Bouchillon, Paralegal
MOON LAW FIRM
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June 25, 2014
Greenville, South Carolina

MOON LAW

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info@moonlawsc.com

25 June 2014
VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

JUN 27 2014

SC Court of Appeals

Re: Bank of New York Mellon Trust v. Chartreuse Grier,
Appellate Case No.: 2013-002403

Dear Ms. Kitchings:

This letter is to request a fifteen (15) day extension of time to file Appellant's Initial Reply Brief. Please find enclosed the original and six (6) copies of a motion requesting a fifteen (15) day extension of time to file Appellant's Reply Brief, along with a Certificate of Service for the same. Please also find enclosed my firm's check in the amount of \$25.00 for the motion fee. Please note that prior to making this request, I contacted counsel for the respondents and obtained their consent for the same.

Please do not hesitate to contact me if you have any questions or concerns. We greatly appreciate the assistance of your office.

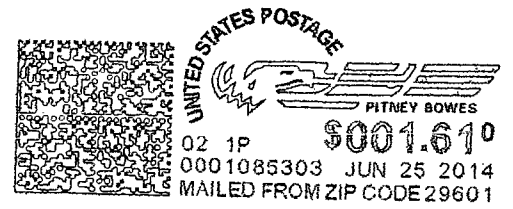
Sincerely,

MOON LAW FIRM



Sarah E. Brown

cc: Alana Odom Williams, Esq.
Jay T. Thompson, Esq.



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JUN 27 2014

SC Court of Appeals

MOONLAW

1 Augusta Street, Suite 301
Greenville, SC 29601

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

