

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

172897

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

RECEIVED

JUL 17 2014

Case No. 2011-CP-40-6103

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.

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.

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

Appellant, by and through her undersigned attorney, respectfully moves this Court for an Order granting a fourteen (14) day extension of time to file Appellant's Initial Reply Brief in the above-captioned matter. This is Appellant's second request for an extension for the Initial Reply Brief, and Appellant believes that the Respondents will not be prejudiced by this extension.

Pursuant to this Court's Order dated June 30, 2014, Appellant's Initial Reply

Brief and designation of matter are currently due July 23, 2014.

Appellant respectfully requests that the Court grant a fourteen (14) day extension, making the Initial Reply Brief due on August 6, 2014. Counsel for Appellant requests this extension due to Ms. Moon's maternity leave, our North Carolina co-counsel, Mike Wimer, being called to trial this week, and other case demands and impending deadlines, all of which prevent the completion of Appellant's Initial Reply Brief and designation of matter within the anticipated July 23, 2014, deadline.

WHEREFORE, Appellant seeks an order of the Court granting an additional fourteen (14) days to file Appellant's Initial Reply Brief and designation of matter, thereby extending the deadline to August 6, 2014.

Respectfully submitted,

MOON LAW FIRM



Sarah E. Brown (SC Bar #81743)
M. Allison Moon (SC Bar #73717)
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Attorneys for Appellant, Chartrease Grier

July 14, 2014
Greenville, South Carolina

MOON LAW

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14 July 2014
VIA U.S. MAIL

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

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

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of a motion requesting a fourteen (14) day extension of time to file Appellant's Initial Reply Brief, along with Proof of Service of the same on counsel for Respondents. Please also find enclosed my firm's check in the amount of \$25.00 for the motion fee. As the Initial Reply Brief is currently due on July 23, 2014, the granting of this Motion would extend the deadline to August 6, 2014.

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.
Elizabeth Herlong Brogdon, Esq.

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v.

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

v.

Chartrease Grier, Third-Party Plaintiff,Appellant,

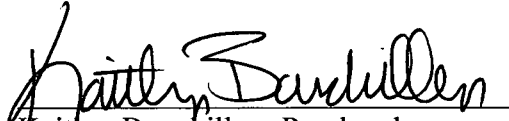
v.

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

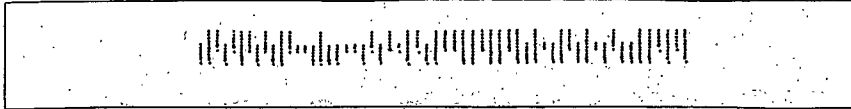
PROOF OF SERVICE

I, the undersigned paralegal of Moon Law Firm, attorneys for Appellant, do hereby certify that on the 14th day of July, 2014, I served all counsel in this action with a copy of the MOTION FOR AN ADDITIONAL 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
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July 14, 2014
Greenville, South Carolina



Greenville PADC 296

TUE 15 JUL 2014 PM

MOONLAW

1 Augusta Street, Suite 301
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