

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

OCT 29 2014

James O. Spence, Master-in-Equity

SC Court of Appeals

74003

Common Pleas Case No. 2009-CP-32-506
Appellate Case No. 2014-001686

Bank of America, N.A., as successor by merger to BAC Home Loans Servicing, LP
FKA Countrywide Home Loans Servicing, LP,.....Respondent,

v.

Elisabeth Orvin and Randy J. Elrod, Defendants,

Of whom Elisabeth Orvin is the.....Appellant.

MOTION FOR ONE-WEEK EXTENSION OF TIME TO SERVE AND FILE
APPELLANT'S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Andrew S. Radeker
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a **one-week** extension of the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

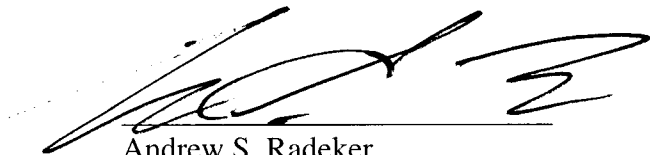
1. The deadline for service and filing of Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal is currently today, October 29, 2014.
2. This deadline has only been extended twice previously.
3. This case did not settle at the October 15, 2014, mediation.
4. The undersigned counsel has had numerous court events and mediations, as well as a family reunion at which his children were able to meet cousins of theirs for the first time, since that mediation. These events have taken time, time that could otherwise have been spent on drafting the Appellant's brief in this case.
5. While much of the Appellant's brief in this case has already been drafted, it is not yet complete. The undersigned's file for this case is in several banker's boxes, and going through the record has not been a simple task.
6. Not a lot of extra time is needed to complete the brief and designation. The undersigned moves for a one-week extension of the deadline out of an abundance of caution.
7. Further, since Appellant's counsel had a copy of the transcripts at the time this appeal began, this appeal is already further along than

it would ordinarily be. Accordingly, granting this extension will not unduly delay this appeal.

8. Particularly in light of that, it is hard to see how granting this extension could prejudice the Respondent or crowd the docket of this court.
9. Appellant's counsel believes there is good cause to grant the requested one-week extension to November 5, 2014.

WHEREFORE Appellant prays for an Order extending the time in which to serve and file Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal by one week.

Respectfully submitted,



Andrew S. Radeker
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(803) 779-2211
Attorney for Appellant

October 29, 2014

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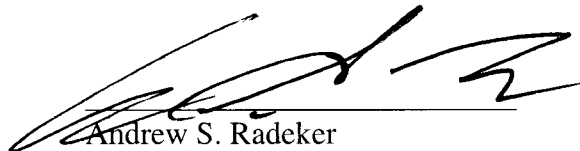
Of whom Elisabeth Orvin is the.....Appellant.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension of time by depositing
a copy of it on the date shown below in the United States Mail, postage prepaid,
addressed as follows:

T. Richmond McPherson III, Esq.
McGuire Woods LLP
201 N. Tryon St., Suite 3000
Charlotte, NC 28202

October 29, 2014



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October 29, 2014

VIA HAND DELIVERY

The Hon. Jenny Abbott Kitchings
Clerk of Court, Court of Appeals of South Carolina
Edgar Brown Building
1205 Pendleton Street
Columbia, South Carolina 29201

Re: Bank of America, etc. v. Elisabeth Orvin, et al.
Appellate Case No. 2014-001686

Dear Ms. Kitchings:

Enclosed herewith for filing are an original and seven copies of the Appellant's Motion for Extension of Time in the above-referenced case, along with Proof of Service of the same. Kindly file the same and return a clocked copy thereof to this office in the stamped and addressed envelope enclosed.

Kindly file these documents and return a file-stamped copy thereof to the bearer of this letter. The motion fee of \$25.00 accompanies this letter. Thank you for your attention to this matter. Of course, if you or your staff have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am,

Very truly yours,
HARRISON & RADEKER, P.A.



Andrew S. Radeker

ASR/

Enclosures

cc: T. Richmond McPherson III, Esq.