

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Thomas A. Russo, Circuit Judge

Common Pleas Case No. 2011-CP-32-3461
Appellate Case No. 2014-001766

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SC Court of Appeals

Wells Fargo Bank, N.A.,.....Respondent,

v.

Gisela B. Moore, Thomas J. Moore a/k/a Tom J. Moore, and John Moore, Appellants.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
APPELLANTS' INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

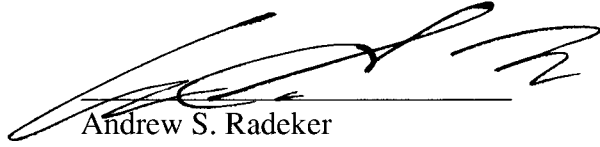
Andrew S. Radeker
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellants

Appellants hereby move pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file Appellants' 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 Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal is currently November 24, 2014.
2. This is the first extension that Appellants have sought in this appeal.
3. Respondent's counsel has consented to this extension, as shown by the attached email message.
4. Appellants' counsel has a brief due in a case pending before the Supreme Court of South Carolina on the same day as the initial brief and designation in this case are currently due, and he does not believe he will have time to complete that brief and this one by the current deadline.
5. Appellant's counsel believes there is good cause to grant the requested 30-day extension to December 23, 2014.

WHEREFORE Appellants pray for an Order extending the time in which to serve and file Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal for an additional thirty days.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew S. Radeker", is written over a horizontal line.

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

November 20, 2014

Drew Radeker

From: Tommy Lydon <tlydon@mgclaw.com>
Sent: Wednesday, November 19, 2014 12:52 PM
To: Drew Radeker
Subject: RE: Wells Fargo v. Moore

Confirmed.

From: Drew Radeker [<mailto:Drew@harrisonfirm.com>]
Sent: Wednesday, November 19, 2014 12:52 PM
To: Tommy Lydon
Subject: Wells Fargo v. Moore

Tommy:

This will confirm our conversation just now in which you advised that you consent to a 30-day extension of our brief and designation deadline in this appeal.

Thanks.

Drew Radeker

HARRISON & RADEKER, P.A.

ATTORNEYS AT LAW


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Personal Injury · Consumer Law · Mediation/ Arbitration · False Arrest · Commercial Litigation*

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Tommy Lydon, Attorney
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1320 Main Street, 10th Floor
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Wells Fargo Bank, N.A.,.....Respondent,

v.

Gisela B. Moore, Thomas J. Moore a/k/a Tom J. Moore, and John Moore, Appellants.

PROOF OF SERVICE

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

Thomas E. Lydon, Esq.
McAngus, Goudelock & Courie, LLP
P.O. Box 12519
Columbia, SC 29211

November 20, 2014



Andrew S. Radeker
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(803) 779-2211
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James C. Harrison, Jr.*
Andrew S. Radeker
Taylor M. Smith IV

* Mediator/Arbitrator

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Columbia, SC 29250

(803) 779-2211
(803) 779-6700 (FAX)

November 20, 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

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SC Court of Appeals

Re: **Wells Fargo Bank, N.A. v. Gisela B. Moore, et al.**
Common Pleas Case No.: 2011-CP-32-3461
Appellate Case No. 2014-001766

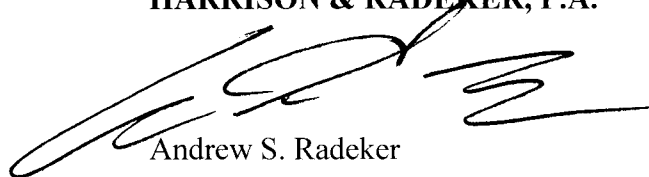
Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced case are an original and seven copies of a motion for extension of time, with attached proof of service thereof. Also enclosed is this firm's check in the amount of \$25.00 as the motion fee.

Kindly file these documents and return a file-stamped copy thereof to the bearer of this letter. 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: Thomas E. Lydon, Esq.