

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable James O. Spence, Master-In-Equity

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

RECEIVED

NOV 20 2014

SC Court of Appeals

74214

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 theAppellant.

**RESPONDENT’S MOTION TO EXTEND TIME TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

The undersigned, attorneys for the Respondent, Bank Of America, N.A., as successor by merger to BAC Home Loans Servicing, LP FKA Countrywide Home Loans Servicing, LP (“Bank of America”), pursuant to Rule 263, SCACR, hereby moves for an extension of time to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal.

The grounds for this motion are that Respondent’s attorneys require additional time to investigate and respond to Appellant’s arguments and need a thirty (30) day extension of time to file the Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Appellant’s Initial Brief and Designation of Matter to be Included in the Record on appeal was

filed on November 5, 2014 with this Honorable Court and Counsel for Respondent received the initial brief on November 12, 2014. With the upcoming holiday schedule of Thanksgiving and Christmas, Counsel for Respondent request additional time to respond to the Appellant's Initial Brief to and including until January 12, 2015. Bank of America conferred with counsel for Appellants, who consent to this request.

Respectfully submitted, this 19th day of November, 2014.

MCGUIREWOODS LLP



Robert A. Muckenfuss (SC Bar #13903)
T. Richmond McPherson, III (SC Bar #80432)

MCGUIREWOODS LLP

201 North Tryon Street, Suite 3000

Charlotte, North Carolina 28202

Telephone: (704) 343-2000

Facsimile: (704) 343-2300

rmuckenfuss@mcguirewoods.com

rmcpherson@mcguirewoods.com

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

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RESPONDENT'S MOTION TO EXTEND TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** has been served upon the parties in this action by mailing a copy thereof, postage prepaid, to the following:

Andrew Radeker, Esq.
HARRISON & RADEKER, P.A.
923 Calhoun Street
Columbia, South Carolina 29201

Attorney for Appellant Elisabeth Orvin

This the 19th day of November, 2014.



T. Richmond McPherson (SC Bar #80432)

RECEIVED

NOV 20 2014

SC Court of Appeals

McGuireWoods LLP
Fifth Third Center
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel 704.343.2000
Fax 704.343.2300
www.mcguirewoods.com

Antoine L. Robinson
Direct: 704.343.2047

McGUIREWOODS

arobinson@mcguirewoods.com
Direct Fax: 704.444.8813

November 19, 2014

VIA FEDERAL EXPRESS MAIL

The Honorable Jenny Abbott Kitchings
South Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, SC 29201

Re: *Bank of America, N.A. vs. Elisabeth Orvin, et al.*
Court of Appeals No. 20143-001686
Trial Court No. 2009-CP-32-506

Dear Ms. Kitchings:


Please find enclosed an original and six (6) copies of Respondent Bank of America, N.A.'s Motion to Extend time to File Initial Brief and Designation of Matter to be Included on the Record on Appeal in connection with the above-referenced matter. I have also enclosed our firm's check in the amount of \$25.00 for the filing fees for the Motion and the self-addressed stamped envelope for the return of the filed copies.

By copy of this letter, we are serving counsel for the Appellant with a copy of the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter to be Included on the Record on Appeal.

Thank you in advance for your kind consideration in this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

McGuireWoods LLP


Antoine L. Robinson, NCCP
Litigation Paralegal

cc: Andrew Radeker, Esq.

RECEIVED

NOV 20 2014

SC Court of Appeals

From: (704) 343-2000
Antoine L. Robinson
McGuireWoods LLP
201 North Tryon St
Suite 3000
Charlotte, NC 28202

Origin ID: QWGA



J142214092303iv

Ship Date: 19NOV14
ActWgt: 0.5 LB
CAD: 103720227/WSX12750

Delivery Address Bar Code



Ref # 4452178-9095
Invoice #
PO #
Dept #

NOV 20 2014

SC Court of Appeals

SHIP TO: (803) 734-1890

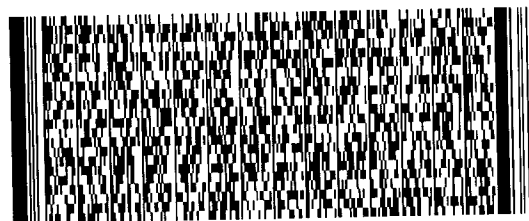
BILL SENDER

**The Honorable Jenny A. Kitchings
Clerk SC Court of Appeals
1015 SUMTER ST**

COLUMBIA, SC 29201

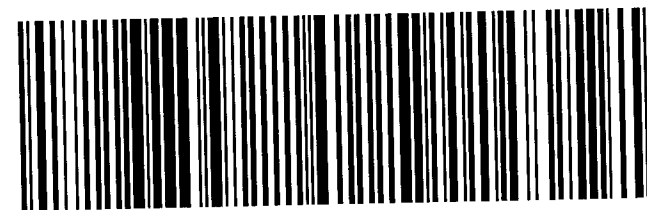
THU - 20 NOV 10:30A
PRIORITY OVERNIGHT

TRK# 7719 1242 6620
0201



XH USCA

29201
SC-US
CAE



522G1516C8AC9