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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Master-In-Equity

The Honorable Marvin H. Dukes, III

Case No. 2012-210910

CitiMortgage, Inc.....Respondent,

v.

Daniel Junk a/k/a Daniel L. Junk and Christine H. Junk and
Oldfield Community Association Defendants,

Of Whom Daniel L. Junk and Christine H. June are Appellants,

Daniel L. Junk and Christine H. Junk Counterclaim Appellants,

v.

CitiMortgage, Inc..... Counterclaim Respondent.

Daniel L. Junk and Christine H. Junk Third-Party Appellants,

v.


Riley Pope & Laney, LLC, Heidi Carey, Esq., Roy Laney, Esq.,
T. Lowndes Pope, Esq., Bayview Loan Servicing, LLC, MERSCORP, Inc.,
Mortgage Electronic Registration Systems, Inc., Citi Master Servicing,
Citigroup Global Markets Realty Corp., Citigroup Mortgage Loan Trust, Inc.,
John Does 1-5,000, Jennifer Oakes, Robert G. Hall, Security Connections, Inc.,
Krystal Hall, Danielle Sterling, ABC Appraisal Group, Inc., Mark A. Ruplinger,
Linda Heller, Harry Jones, Colonial Coast Title Agency, Inc.,
Lawyers Title Insurance Corporation, Corelogic, Inc., and
American Home Mortgage Holdings, Inc..... Third-Party Respondents.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240(e) of the South Carolina Appellate Court Rules, Third-Party Respondent Colonial Coast Title Agency, Inc. ("Colonial Coast") seeks an extension of time to file a return to Appellants' Motion to Withdraw the Appeal. The motion is dated December 18, 2014, but it is unclear when the motion was served given Appellants' failure to include a proof of service with the motion. Colonial Coast did not receive a copy of the motion from Appellants until December 23, 2014, the day before the Christmas Eve holiday. Because of the timing of receipt of the motion from Appellants, the intervening Christmas and New Year's holidays, and the need for sufficient time to prepare a response, Colonial Coast respectfully requests an extension of time until January 8, 2015, to file a return to the motion. If granted, the extension will give Colonial Coast eight days, excluding weekends and holidays, from the time of receipt of the motion from Appellants to prepare a return or to determine whether to join another return. This is Colonial Coast's first request for an extension of time with regard to this deadline.

SOWELL GRAY STEPP & LAFFITTE, LLC

By: _____


Elizabeth Van Doren Gray (S.C. Bar #2434)
Tina Cundari (S.C. Bar #71951)
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December 30, 2014

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Krystal Hall, Danielle Sterling, ABC Appraisal Group, Inc., Mark A. Ruplinger,
Linda Heller, Harry Jones, Colonial Coast Title Agency, Inc.,
Lawyers Title Insurance Corporation, Corelogic, Inc., and
American Home Mortgage Holdings, Inc..... Third-Party Respondents.

PROOF OF SERVICE

I certify that I have caused to be served Third-Party Respondent Colonial Coast Title Agency, Inc.'s Motion for Extension of Time upon all counsel and Pro Se Appellant by depositing a copy of it in the United States Mail on December 30, 2014, postage prepaid, addressed to:

Mr. Daniel Junk, Pro Se
181 Old Field Way
Okatie, South Carolina 29909

Daniel L. Junk, Pro Se
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Upper Arlington, Ohio 43212

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December 30, 2014

BY HAND-DELIVERY

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

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SC Court of Appeals

Re: CitiMortgage, Inc., Respondent v. Daniel L. Junk and Christine H. Junk, Appellants
Case No. 2012-210910

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter are an original and seven copies of a Motion for Extension of Time on behalf of Third-Party Respondent Colonial Coast Title Agency, Inc. Please file the original and return a filed-stamped copy to my office by our courier.

By copy of this letter and as evidenced by the Proof of Service, I am notifying counsel of record of my communication with the Court.

Sincerely,



Tina Cundari

TMC:mdl

Enclosures

cc: All Counsel of Record (by email)