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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

Court of Appeals Tracking Nos. 2012-210910, 2012-212115 and 2012-212148

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. Junk 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.

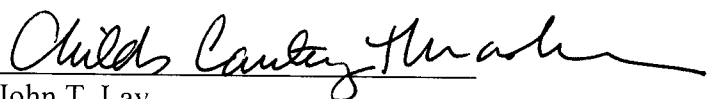
Riley Pope & Laney, LLC, Heidi Carey, Esq., Roy Laney, Esq., T. Lowndes Pope, Esq., Bayview Loan Servicing, LLC, MERSCORP, Inc., Mortgage Electronic Registration Systems, Inc., Citi Master Servicing, Citigroup Global Markets Realty Corp., Citigroup Mortgage Loan Trust, Inc., John Does 1-5,000, Jennifer 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 Respondents Riley, Pope & Laney, LLC; Heidi Carey, Esq.; Roy Laney, Esq. and T. Lowndes Pope, Esq. ("Third Party Respondents") file this Motion for an Extension of Time for their Return to Appellants' Motion to Withdraw the Appeal ("Motion"). Appellants failed to include a proof of service with their Motion. However, the Motion is dated December 18, 2014. Based on our calculations, the Return to such motion is due on December 29, 2014, per Rule 263, SCACR. Third Party Respondents request a ten (10) day extension of time until January 8, 2015, to file their Return. This is the first request for an extension of this deadline.

This request is necessitated due to numerous other work conflicts, scheduling deadlines, and the intervening Christmas and New Year's holidays that conflict with the current due date. The current deadline does not provide sufficient time to properly respond to the Appellants' Motion. Thus, Third Party Respondents respectfully request that this Court extend the return deadline until January 8, 2015.

GALLIVAN, WHITE & BOYD, P.A.

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Columbia, South Carolina

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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.

Proof of Service

I, the undersigned employee of Gallivan, White & Boyd, P.A., attorneys for Third-Party Respondents Riley, Pope & Laney, LLC; Heidi Carey, Esq.; Roy Laney, Esq.; and T. Lowndes Pope, Esq., do hereby certify that I have served all counsel in this action with a copy of the **Motion for Extension of Time** by mailing a copy of the same via United States Mail, postage prepaid, to the following:

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Columbia, South Carolina

December 29, 2014

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VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings
Clerk, SC Court of Appeals
1015 Sumter Street – 5th Floor
Columbia, SC 29201

Re: *CitiMortgage, Inc. v. Daniel I. Junk, et al.*
Civil Action No.: 2009-CP-07-05088
Order on Appeal: February 22, 2012 (“Order Granting Motion to Dismiss Third-Party Complaint”)
Court of Appeals Tracking No. 2012-210910

And

CitiMortgage, Inc. v. Daniel Junk a/k/a Daniel L. Junk, Christina H. Junk and Oldfield Community Association
Civil Action No.: 2009-CP-07-05088
Order on Appeal: April 23, 2012 (“Order Granting CitiMortgage’s Motion to Dismiss Counterclaims”)

And

CitiMortgage, Inc. v. Daniel Junk a/k/a Daniel L. Junk, Christina H. Junk and Oldfield Community Association
Civil Action No.: 2009-CP-07-05088
Order on Appeal: May 3, 2012 (“Form 4 Order Denying Junk’s Motion for Default Judgment”)

Dear Ms. Kitchings:

Please find enclosed the original and eight (8) copies of a Motion for Extension of Time along with the filing fee of \$25.00 in the above-referenced case. Please file these documents and return clocked copies to this office via our courier.

By copy of this letter, and as evidenced on the attached Proof of Service, I am serving counsel of record with the same.

Honorable Jenny Abbott Kitchings
December 29, 2014
Page two

If you have any questions, do not hesitate to contact this office.

Sincerely,



Childs C. Thrasher

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Email Address: cthrasher@GWBlawfirm.com

CCT/sm

Enclosures

Cc: Counsel of Record