

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2014-002079

Coastal Federal Credit Union.....Appellant

v.

Angel Latoria Brown.....Respondent

MOTION FOR EXTENSION OF TIME

This Court has previously granted a 30-day extension of time to the Respondent for the filing of her initial brief, requiring it to be received by the Court no later than December 29, 2014. The Respondent's attorney requests another 30-day extension of time, as he and his law firm require more time to clearly and succinctly articulate the issues before the Court. Furthermore, the Respondent's attorney and members of his firm have been absent and will be absent during this holiday season. Attached to this motion is the communication with Appellant's counsel which states they would not object to a 14 day extension.



Matthew M. Billingsley
SC Bar #: 76095
South Carolina Legal Services
2803 Carner Avenue
North Charleston, SC 29405
(843) 266-2174 (843) 760-1090 (fax)

December 19, 2014

RECEIVED
DEC 23 2014
SC Court of Appeals

Matthew Billingsley

From: Pamela P. Keenan [pkeenan@kirschlaw.com]
Sent: Friday, December 19, 2014 12:56 PM
To: Matthew Billingsley; Sarah Dalonzo-Baker
Subject: RE: CCFU v. Brown

We would not object to a 14 day extension, which would be until January 12th.

From: Matthew Billingsley [mailto:matthewbillingsley@sclegal.org]
Sent: Friday, December 19, 2014 12:53 PM
To: Pamela P. Keenan; Sarah Dalonzo-Baker
Subject: RE: CCFU v. Brown

Yes, I just wanted to give you guys a heads up prior to sending the formal motion.

From: Pamela P. Keenan [mailto:pkeenan@kirschlaw.com]
Sent: Friday, December 19, 2014 12:52 PM
To: Matthew Billingsley; Sarah Dalonzo-Baker
Subject: RE: CCFU v. Brown

Hi, Matt –

Don't you have to get the court's permission for a second extension ?

From: Matthew Billingsley [mailto:matthewbillingsley@sclegal.org]
Sent: Friday, December 19, 2014 12:22 PM
To: Sarah Dalonzo-Baker; Pamela P. Keenan
Subject: CCFU v. Brown

Ms. Dalonzo-Baker and Ms. Keenan,

Our Respondent's brief is due December 29, 2014. Would you consent to an extension? We had a statewide conference and with the holidays, it would be very much appreciated for an extension. Of course, I would not object to extending the same courtesy to you as the appeal proceeds. Please let me know. Thanks!

Matthew M. Billingsley
South Carolina Legal Services
2803 Carner Avenue
North Charleston, SC 29405
phone: 843-266-2174 fax: 843-760-1090

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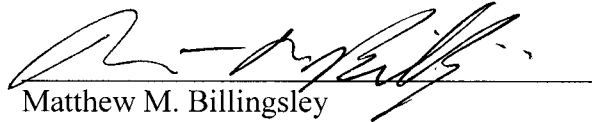
Angel Latoria Brown.....Respondent

CERTIFICATE OF SERVICE

The undersigned attorney certifies that a true copy of the Motion for Extension of Time has been served upon opposing counsel by mailing the true copy in an envelope properly addressed with postage prepaid this 19th day of December, 2014.

Addressed as set forth below:

Sarah Dalonzo-Baker
KIRSCHBAUM, NANNEY, KEENAN & GRIIFIN, P.A.
P.O. Box 19806
Raleigh, NC 27619



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**South Carolina
Legal Services**

Balancing the Scales of Justice

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December 19, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211


Re: Coastal Federal Credit Union, Appellant v. Angel Latoria Brown, Respondent
Case No.: **2014-002079**

Dear Ms. Kitchings:

Please find the enclosed motion for an extension of time to file our Initial Brief for the Respondent, Angel Latoria Brown. The original due date is December 29, 2014. I consulted with opposing counsel, which is enclosed. Enclosed is the \$25 filing fee for the request.

With my kindest regards, I am

Sincerely,


South Carolina Legal Services
Matthew M. Billingsley
Attorney for Respondent

cc: Sarah Dalonzo-Baker





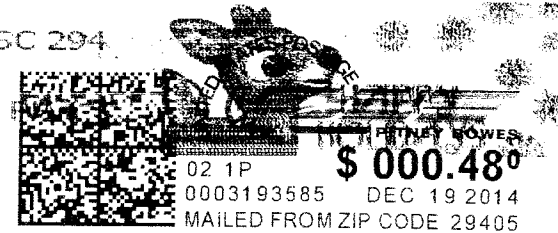
**South Carolina
Legal Services**

Balancing the Scales of Justice

2803 Carner Avenue
North Charleston, SC 29405

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DEC 18 2014

SC COURT OF APPEALS

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
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