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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 No. 2012-210910

RECEIVED

DEC 22 2014

SC Court of Appeals

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 an Extension of Time _____

Pursuant to Rule 240(e) of the South Carolina Appellate Court Rules, Respondent/Counterclaim Respondent CitiMortgage, Inc. ("CitiMortgage") files this Motion for an Extension of Time for its Return to Appellants' Motion to Withdraw the Appeal. Appellants failed to include a proof of service, but the Motion is dated December 18, 2014. Based on our calculations, the Return is due on December 28, 2014, per Rule 263, SCACR. CitiMortgage requests a ten (10) day extension of time until January 8, 2015, to file its Return. This 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 Motion to Withdraw the Appeal. Thus, CitiMortgage respectfully requests that this Court extend the return deadline until January 8, 2015.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:  _____

B. Rush Smith III
SC Bar No. 012941
Brian P. Crotty
SC Bar No. 16983
Michael J. Anzelmo
SC Bar No. 72933
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, South Carolina 29201
803.799.2000

Attorneys for Respondent/Counterclaim
Respondent CitiMortgage, Inc.

Columbia, South Carolina

December 22, 2014

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

_____ 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., Lawyer Title Insurance
Corporation, Corelogic, Inc., and American
Home Mortgage Holdings, Inc., Third-Party Respondents.

Proof of Service

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Respondent/Counterclaim Respondent, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow by all by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings: **Motion to for an Extension of Time**

Counsel Served:

A. Parker Barnes, Jr.
P.O. Drawer 1729
Beaufort, SC 29901-1729

Daniel L. Junk
181 Old Field Way
Okatie, SC 29909

Daniel L. Junk
2827 Chateau Circle S.
Upper Arlington, OH 43212

James G. Long III
Nexsen Pruet, LLC
P.O. Drawer 2426
Columbia, SC 29202

James Y. Becker
Hamilton Osborne, Jr
Haynsworth Sinkler Boyd. P.A.
P.O. Box 11889
Columbia, SC 29221-1889

John T. Lay
Childs Cantey Thrasher
Gallivan White & Boyd, P.A.
P.O. Box 7368

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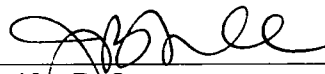
Columbia, SC 29202

Sean Michael Bolchoz
Bolchoz Law Firm, PA
PO Box 828
Bluffton, SC 29910

Demetri "Jim" K. Koutrakos
Callison Tighe & Robinson, LLC
P.O. Box 1390
Columbia, SC 29202

Elizabeth Van Doren Gray
Tina Cundari
Sowell Gray Stepp & Laffitte, LLC
P.O. Box 11449
Columbia, SC 29211

Susan Taylor Wall
Amanda Williams
McNair Law Firm P.A.
Post Office Box 1431
Charleston. South Carolina 29402



Jennifer B. Lee
Administrative Assistant

December 22, 2014

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
1320 Main Street / 17th Floor / Columbia, SC 29201
Tel: 803.799.2000 Fax: 803.255.9024
www.nelsonmullins.com

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Michael J. Anzelmo
Tel: 803.255.9312
Fax: 803.255.9024
michael.anzelmo@nelsonmullins.com

December 22, 2014

Hand Delivered

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

RE: CitiMortgage, Inc. v. Daniel L. 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-07-5088
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:

The Honorable Jenny Abbott Kitchings
December 22, 2014
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Enclosed please find an original and 6 copies of a Motion for an Extension of Time in the above-referenced matter. Please file the original and return a clocked-in copy to me via our courier. Should you have any questions, please do not hesitate to contact me.

By copy of this letter, I am hereby serving opposing parties.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Anzelmo". The signature is stylized with several loops and a long horizontal stroke extending to the right.

Michael J. Anzelmo

MJA:jlee

Enclosures

cc: A. Parker Barnes, Jr.
James Y. Becker
James G. Long
John T. Lay
Childs Cantey Thrasher
Sean Michael Bolchoz
Demetri "Jim" K. Koutrakos
Elizabeth Van Boren Gray
Tina Cundari
Susan Taylor Wall
Hamilton Osborne, Jr.
Daniel L. Junk