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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas  
Thomas A. Russo, Circuit Court Judge

**RECEIVED**  
FEB 12 2015  
**SC Court of Appeals**

Appellate Case No. 2014-001766

Wells Fargo Bank, N.A. . . . . Respondent,

v.

Gisela B. Moore, Thomas J. Moore a/k/a Tom J. Moore, and John Moore . . . Appellants.

**PETITION OF RESPONDENT FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondent hereby requests an extension of time for filing its Initial Brief and Designation of Matter to Be Included in the Record on Appeal.

Respondent was served with Appellants' Initial Brief and Designation of Matter to Be Included in the Record on Appeal on January 14, 2015, so its Initial Brief and Designation are presently due on February 13, 2015. However, Respondent is requesting a thirty-day extension to file its Initial Brief and Designation.

Based on the foregoing, Respondent requests that the deadline for filing its Initial Brief and Designation of Matter to Be Included in the Record on Appeal be extended until March 16, 2015.

McANGUS, GOUDELICK & COURIE, L.L.C.

Thomas E. Lydon  
Post Office Box 12519  
Columbia, South Carolina 29211  
Attorney for Respondent

February 12, 2015

1st  
16 Mar / 13 Feb

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PROOF OF SERVICE

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I hereby certify that I have this 12<sup>th</sup> day of February, 2015, served Respondent's Petition for Extension of Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal by mailing a copy of each, postage prepaid, in the United States mail, with sufficient postage affixed as follows:

Andrew S. Radeker, Esquire  
Harrison & Radeker, P.A.  
Post Office Box 50143  
Columbia, SC 29250

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**SC Court of Appeals**



Thomas E. Lydon  
McAngus, Goudelock & Courie, LLC  
Post Office Box 12519  
Columbia, SC 29211  
Attorney for Respondent

**Reply To**

THOMAS E. LYDON  
Direct Dial: (803) 227-2292  
tlydon@mgclaw.com  
COLUMBIA

February 12, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

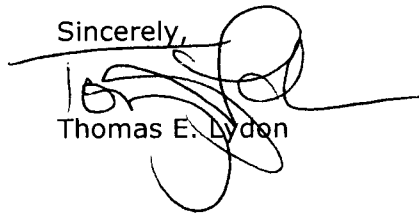
**Re: Wells Fargo Bank, N.A. v. Gisela Moore, et al.  
Appellate Case No. 2014-001766**

Dear Ms. Kitchings:

Enclosed for filing are an original and seven copies of a Petition for Extension of Time to file Respondent's Initial Brief. Also enclosed are the \$25.00 motion fee and Proof of Service. Please file the original Petition and return a clocked-in copy to me.

Thank you for your assistance.

Sincerely,



Thomas E. Lydon

Encl.

Cc: Andrew S. Radeker, Esquire  
Harrison & Radeker, P.A.  
Post Office Box 50143  
Columbia, SC 29250

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