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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas
Philip E. Wright, Special Referee

Appellate Case No. 2013-002373

RECEIVED
FEB 13 2015
SC Court of Appeals

75037

H&R Block Bank, FSB.....Respondent,

v.

Ziraili M. Elbey a/k/a Ziraili Mohassan El Bey, WKFC Living Trust
Under Trust Agreement Dated June 4, 2010 By and Through its Trustee
Wellesley K. Clayton, American Home Mortgage Servicing, Inc.
s/b/m to Option One Mortgage Corporation.....Defendants,

Of whom Ziraili M. Elbey a/k/a Ziraili Mohassan El Bey is the.....Appellant.

MOTION FOR EXTENSION OF PAGE LIMIT

Respondent, H&R Block Bank, FSB, through undersigned counsel, moves for an extension of the page limit for the Appendix to the Record on Appeal, and as grounds therefore states as follows:

1. In this matter, Appellant has appealed from the Supplemental Special Referee's Report and Judgment of Foreclosure Sale entered by the Lancaster County Special Referee on November 12, 2013. The matters before the special referee at the time of judgment included

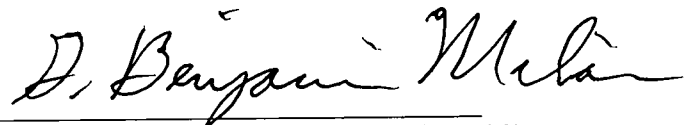
voluminous filings by Appellant, including the Answer to Plaintiff's Motion and Order to Restore filed August 5, 2013; Defendant's Motion to Vacate Judgment of Foreclosure Sale filed August 6, 2013; Defendant's Refusal to Plaintiff's Offer to Contract filed August 9, 2013; Defendant's Motion to Amend and Set Aside or Void Judgment filed August 20, 2013; Defendant's Release Deficiency Demand and Foreclosure Judgment filed August 21, 2013; and exhibits filed at the October 24, 2013 hearing on the Respondent's Motion to Strike and Motion for Sanctions.

2. Respondent seeks to submit an accurate record of the filings that were before the Special Referee by including such filings in the Appendix to the Record on Appeal. However, the proposed Appendix to the Record on Appeal served contemporaneously with this Motion numbers two hundred ninety-one pages, which exceeds the two hundred fifty pages permitted under Rule 267 of the South Carolina Appellate Court Rules.

3. Respondent respectfully requests that the page limit be expanded to allow the number of pages in the proposed Appendix to the Record on Appeal.

WHEREFORE, Respondent, H&R Block Bank, FSB respectfully requests that this Court expand the page limit under SCACR 267 to allow the number of pages in the proposed Appendix to the Record on Appeal.

February 12, 2015



Chad W. Burgess, Esq. (SC Bar# 72520)
Brock and Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, SC 29210
(803) 454 3540

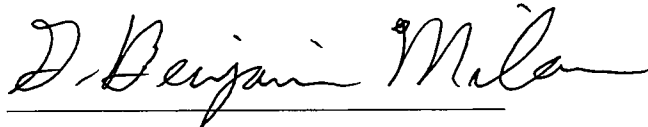
G. Benjamin Milam, Esq. (SC Bar#80311)
McGuireWoods LLP
201 North Tryon Street, Suite 3000
Charlotte, NC 28202
(704) 343-2000
Attorneys for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing Motion was served on the Appellant by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Ziraili M. Elbey
9789 Charlotte Highway, #400-191
Indian Land, South Carolina 29707
Appellant

This the 12 day of February, 2015.

A handwritten signature in cursive script, reading "G. Benjamin Milam", written over a horizontal line.

G. Benjamin Milam, Esq.

STATE OF SOUTH CAROLINA)

IN THE COURT OF APPEALS)

H&R BLOCK BANK, FSB)

APPELLATE CASE NO. 2013-002373)

175037

Respondent)

v.)

MOTION AND ORDER INFORMATION)
FORM AND COVER SHEET)

ZIRAILI M. ELBEY A/K/A ZIRAILI MOHASSAN)
EL BEY, WKFC LIVING TRUST UNDER TRUST)
AGREEMENT DATED JUNE 4, 2010 BY AND)
THROUGH ITS TRUSTEE WELLESLEY K.)
CLAYTON, AMERICAN HOME MORTGAGE)
SERVICING, INC. S/B/M TO OPTION ONE)
MORTGAGE CORPORATION)

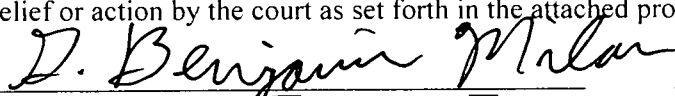
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FEB 13 2015

SC Court of Appeals

Defendants,)

OF WHOM ZIRAILI M. ELBEY A/K/A ZIRAILI)
MOHASSAN EL BEY IS THE)

Respondent's Attorney: Chad W. Burgess - Bar No. 72520; G. Benjamin Milam - Bar No. 80311	Pro Se Appellant: Ziraili M. Elbey
Address: McGUIREWOODS LLP Fifth Third Center 201 N. Tryon Street (Suite 3000) Charlotte, NC 28202	Address: 9789 Charlotte Highway 400-191 Indian Land, South Carolina 29707
Phone: (704) 343-2052 fax:	Phone: (803) Fax:
e-mail: other:	233-2665 e-mail: other:
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input checked="" type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: _____	
Estimated Time Needed _____ Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input type="checkbox"/> Written motion attached <input checked="" type="checkbox"/> Form Motion/Order	
I hereby move for relief or action by the court as set forth in the attached proposed order.	
 02/12/14	
Signature of Attorney for <input checked="" type="checkbox"/> Respondent / <input type="checkbox"/> Defendant Date submitted	

SECTION III: Motion Fee

PAID – AMOUNT: \$25.00

- EXEMPT: (check reason) Rule to Show Cause in Child or Spousal Support
 Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRCF)
 Proposed order submitted at request of the court; or,
reduced to writing from motion made in open court per judge's instructions
Name of Court Reporter: _____
 Other: _____

JUDGE'S SECTION

- Motion Fee to be paid upon filing of the attached order.
 Other: _____

JUDGE

CODE: _____ Date: _____

CLERK'S VERIFICATION

Date Filed: _____

Collected by: _____

- MOTION FEE COLLECTED: _____
 CONTESTED – AMOUNT DUE _____

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Charlotte, NC 28202
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February 12, 2015

VIA FEDERAL EXPRESS
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Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
PO BOX 11629 (29211)
Columbia, South Carolina 29201

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FEB 13 2015

SC Court of Appeals

Re: H&R Block Bank, FSB vs. Ziraili M. Elbey et al.
Case No. 2013-002-373

Dear Ms. Kitchings:


Enclosed please find an original and one (1) copy of Respondent's Motion for Extension of Page Limit, Cover Sheet, and check in the amount of \$25.00, along with an original and fifteen (15) copies of Respondent's Appendix to the Record on Appeal, regarding the above-captioned matter.

Upon receipt, kindly file the originals and return the conformed copies to my attention in the postage-paid envelope provided for your convenience.

Please feel free to contact me should you have any questions. Thank you for your assistance.

Sincerely,

MCGUIRE WOODS LLP


Muriel Powell
Paralegal

/MP
Enclosures
c: Ziraili M. Elbey (w/encls.)