

STATE OF SOUTH CAROLINA  
In the Court of Appeal

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, Jr.

Appellate case No.: 2014-001297

**RECEIVED**  
MAR 03 2015  
**SC Court of Appeals**

National Bank of SC,.....Respondent,

v.

Thaddeus F. Segars; KCS Investments, LLC; Singleton  
Place Homeowners Association Inc.; and Suntrust  
Mortgage Inc.,.....Defendants,

Of Whom Thaddeus F. Segars is the,.....Appellant.

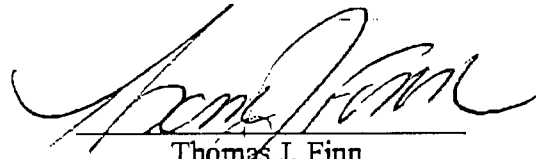
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AMENDED MOTION TO EXTEND TIME FOR FILING  
APPELLANTS' REPLY BRIEF

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The Appellant, Thaddeus Segars hereby respectfully moves to the court for an extension of time to file the Appellants' Reply Brief in the above captioned case which is due on March 5, 2015. The Appellant, Thaddeus Segars, request an additional ten (10) days to file the Appellants' Reply Brief.

This Motion pursuant to Rule 224 of the South Carolina Appellate Court Rules of Procedure and on the grounds that, Counsel for the Appellant is a solo practitioner and is preparing for a day certain jury trial on the roster for March 2, 2014, in Beaufort County. The trial of the case is expected to last three to four days. Counsel for the Respondent has no objections to this request.

A handwritten signature in black ink, appearing to read "Tom Finn", written over a horizontal line.

Thomas J. Finn  
Post Office Box 6003  
Hilton Head island, SC 29938  
Phone: (843)682-3555  
Fax: (843) 682-3558  
[finlaw@hargray.com](mailto:finlaw@hargray.com)

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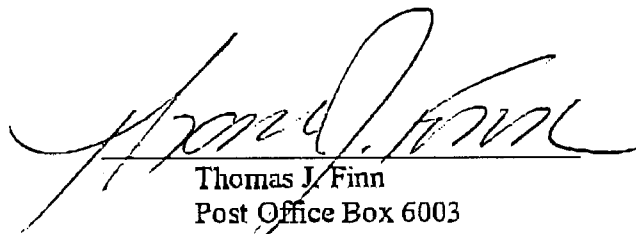
Of Whom Thaddeus F. Segars is the ,.....Appellant.

AMENDED PROOF OF SERVICE

I CERTIFY THAT I HAVE SERVED one (1) copy of Appellants' Amended Motion for an Extension of Time for Filing Appellants' Reply Brief on Respondent, National Bank of South Carolina, by depositing a copy of it in the United States Mail, postage prepaid and emailed, on February 3<sup>rd</sup>, 2015, addressed to their attorney of record, Bryson M. Geer and Dan Saxon at each of their offices listed at the address listed below.

Bryson M. Geer, Esq.  
Nelson Mullins Riley & Scarborough, LLP  
Post Office Box 1806  
Charleston, SC 29401-2239  
[Bryson.geer@nelsonmullins.com](mailto:Bryson.geer@nelsonmullins.com)

Daniel Allen Saxon, Esq.  
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Attorney for Appellant, Thaddeus Segars

February 3<sup>rd</sup>, 2015.

FINN LAW FIRM, P. C.  
OPERATING ACCT  
P O BOX 6003  
HILTON HEAD ISLAND, SC 29928-6003

DATE 03-24

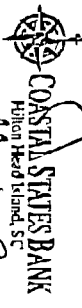
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FT 810537

PAY TO THE ORDER OF SC Court of Appeals

\$ 25.00

DOLLARS



COASTAL STATES BANK  
Hilton Head Island, SC

FOR Appellants' Reply Brief

Henry J. Kunk

⑆004970⑆ ⑆053208105⑆3100012669⑆

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**SC Court of Appeals**

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**THOMAS J. FINN, ESQUIRE**  
Also Licensed in GA & CT

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Email: [finlaw@hargray.com](mailto:finlaw@hargray.com)

March 3, 2015

VIA-FAX & US-MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201  
(803)734-1496

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MAR 03 2015

## SC Court of Appeals

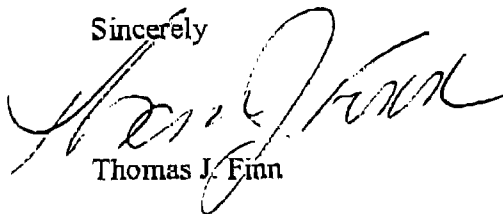
**RE: NATIONAL BANK OF SC vs. THADDEUS F. SEGARS;  
KCS INVESTMENTS, LLC; SINGLETON PLACE  
HOMEOWNERS ASSOCIATION, INC., and SUNTRUST MORTGAGE,  
INC.  
CASE NO.: 2009-CP-07-3201  
APPELLATE CASE NO.: 2014-001296**

Dear Mrs. Kitchings:

Enclosed please find an Amended Motion to Extend Time for Filing Appellants' Reply Brief. I've also enclosed my firm's check in the amount of twenty-five dollars, (\$25.00) to cover the filing fee.

If you have any questions or comments, please do not hesitate to contact the office.

Sincerely



Thomas J. Finn

TJF: caw

cc:

Bryson M. Geer, Esq.  
Daniel Allen Saxon, Esq.

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MAR 03 2015

**FINN LAW FIRM, P.C.**  
**38D-4 NEW ORLEANS ROAD (29928)**  
**POST OFFICE BOX 6003**  
**HILTON HEAD ISLAND, SOUTH CAROLINA (29938)**

**SC Court of Appeals**

**TELEFAX DISTRIBUTION COVER PAGE:**

**DATE: 3-3-2015**

**TO: The Honorable Jenny Kitchings, (803)734-1496**

**FROM: Thomas J. Finn, Esq. (843)682-3558**

**RE: NBSC vs. Thaddeus F. SEGARS; KCS INVESTMENTS;  
SINGLETON PLACE HOMEOWNERS ASSOCIATION,  
INC.,; and SUNTRUST MORTGAGE  
CASE NO.: 2009-CP-07-3201  
APPELLATE CASE NO.: 2014-001296**

**NUMBER OF PAGES INCLUDING COVER SHEET:6**

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