

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

The Honorable R. Knox McMahon

Case No. 11-CP-29-00873

Appellate Case No. 2014-001505

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MAR 04 2015

SC Court of Appeals

175243

Wells Fargo Bank, N.A.,
Successor by merger to Wachovia Bank, N.A., Respondent,

v.

Ronald P. Pappas, a/k/a Ronald Peter Pappas, and
Camine Pappas, Appellants,

And

Ronald P. Pappas, a/k/a Ronald Peter Pappas, and
Camine Pappas, Cross-Plaintiffs,

v.

Wells Fargo Bank, N.A.,
Successor by merger to Wachovia Bank, N.A., Cross-Defendant.

MOTION FOR
EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellants, by their counsel herein, move this Court for an order granting them a brief extension of time in which to file their Initial Reply Brief, on the grounds stated below:

1. The time for filing the Respondent's Initial Reply Brief was set by Order to March 2nd, 2015,

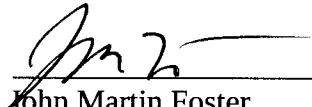
based upon the service of Respondent's Initial Brief, and upon the Appellants' resulting Motion for Extension..

2. Since the said Motion for Extension, counsel for the Appellants has been delayed by the winter weather in York County, and by the failure of his computer and the need to program a new computer. Due to these matters, Counsel for Appellants was not capable of completing the Appellants' Reply Brief by the set deadline.
3. Counsel for Appellants requests an extension for an additional five (5) days, that is, through Friday, March 6th, 2015.

The basis of this Motion is the within-cited Rule, the records of this appeal, and any attached affidavit or stipulation of the undersigned, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellants herein move this Court for an extension of time in which to file their Initial Reply Brief for an additional period, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

March 2, 2015



John Martin Foster
Post Office Box 106
Rock Hill, S.C. 29731-6106
(803) 324-8100
Attorney for Appellants

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PROOF OF SERVICE

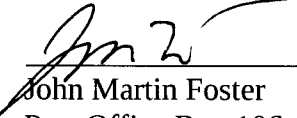
I certify that I have served the **Motion for Extension of Time**, dated March 2, 2015, on the following counsel or persons of record:

S. Sterling Laney, III
Hugh M. Claytor
Womble Carlyle Sandridge & Rice, LLP
550 South Main Street, Suite 400
Greenville, SC 29601
Attorneys for Respondent

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out below; or

by hand delivering copies of the same to the following persons, or by leaving the same at that person's office with that person's clerk or some other person in charge thereof, or by leaving it in a conspicuous place therein; of if the office was closed or the person to be served has no office, by leaving a copy at that person's dwelling place or usual place of abode with some person of suitable age and discretion then residing therein, all pursuant to Rule 262(b), S.C.A.C.R.

March 2, 2015



John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
(803)324-8100
Attorney for Appellants

JOHN MARTIN FOSTER

Attorney at law

The Guardian Building	PO Box 106	803 324 8100
223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

March 2, 2015

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

Re: Wells Fargo Bank, N.A., Respondent,
v. Ronald P. Pappas and Camine Pappas, Appellants.
Appellate Case No. 2014-001505

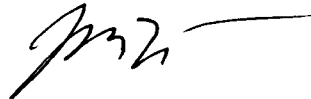
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(b), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellants' Motion for Extension of Time to file their Initial Reply Brief, together with Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorneys for the Respondent with copies of the said Motion for Extension of time, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely yours,



John Martin Foster

jmf/
enclosures

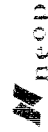
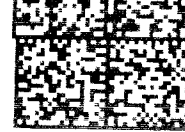
cc: Client File

S. Sterling Laney, III
Hugh M. Claytor
Womble Carlyle Sandridge & Rice, LLP
550 South Main Street, Suite 400
Greenville, SC 29601
Attorneys for Respondent
864 255-5417

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MAR 04 2015

SC Court of Appeals



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03/02/15

Mailed From 29730



John Martin Foster Attorney

223 East Main St Suite 520
Post Office Box 106
Rock Hill SC 29731-6106

TO: THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF THE COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, S.C. 29211

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SC Court of Appeals