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**RECEIVED**  
MAR 23 2015  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

The Honorable Charles B. Simmons, Jr., Master-in-Equity

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Case No.: 2010-CP-23-1321  
Appellate Case No.: 2014-002381

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Deutsche Bank National Trust Company as Trustee for  
First Franklin Mortgage Loan Trust 2006-FFI Pass-Through  
Certificates, Series 2006-FFI ..... Respondent,

v.

Dora S. Morrow, Ray Martin, and Lease and Rental Management  
Corp. d/b/a Auto Use and Auto Loan, a Massachusetts  
Corporation, Southern New Hampshire Bank and Trust Company,  
a New Hampshire Bank, and Edman Hackworth ..... Defendants.

---

Edman Hackworth ..... 3<sup>rd</sup> Party Plaintiff,

v.

John Morrow ..... 3<sup>rd</sup> Party Defendant.

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John Morrow and Dora Morrow ..... 3<sup>rd</sup> Party Plaintiffs,  
Of Whom John Morrow and Dora Morrow are ..... Appellants,

v.

Edman Hackworth and Debbie Hackworth ..... 3<sup>rd</sup> Party Defendants,  
Of Whom Edman Hackworth is ..... Respondent.

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RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF and DESIGNATION OF MATTER

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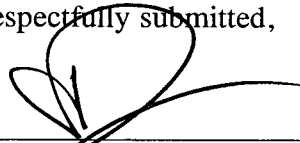
Pursuant to Rule 240, SCACR, Respondent, Edman Hackworth ("Respondent"),

hereby requests that the Court grant Respondent a thirty (30) day extension in which to file his Initial Brief and Designation of Matter in the above captioned matter. Currently, Respondent's Initial Brief is due on or before March 25, 2015. Counsel for Respondent has obtained the consent of counsel for Appellants as to this motion, and counsel for Respondent believes that the requested extension will neither prejudice the parties nor unduly delay this appeal. Counsel for Respondent is making this request because in the past month and throughout the course of this month, counsel for Respondent has been engaged in mediations, motion hearings, depositions, and a bench trial, as well as preparing a post arbitration brief, and is currently working on a complex contract dispute matter, and will be engaged in motion hearings and pretrial conferences during the month of April.

It is further requested that all time be held in abeyance during the pendency of this motion.

No memorandum in support of this motion is being filed as it is counsel's belief that such memorandum would not aid the Court in ruling on the motion.

Respectfully submitted,



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Thomas E. Dudley, III (SC Bar # 66154)  
Kenison, Dudley & Crawford, LLC  
704 East McBee Avenue  
Greenville, SC 29601  
(864) 242-4988

Attorney for Respondent

March 17<sup>th</sup>, 2015  
Greenville, SC

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Of Whom Edman Hackworth is ..... Respondent.

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**PROOF OF SERVICE**

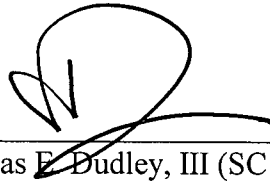
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The undersigned hereby certifies that a true copy of the Respondent Edman Hackworth's Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced case has been served on all parties of record by mailing a copy of same in the United

States mail, postage prepaid this 17<sup>th</sup> day of March, 2015, addressed as follows:

David R. Price, Jr.  
David R. Price, Jr., P.A.  
Post Office Box 2446  
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Attorney for Appellants

Matthew Tillman  
Womble Carlyle Sndridge & Rice, LLP  
5 Exchange Street  
Charleston, SC 29401  
Attorney for Respondent  
Deutsche Bank National Trust Company



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Thomas E. Dudley, III (SC Bar # 66154)  
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Greenville, SC 29601

Attorney for Respondent  
Edman Hackworth

# KENISON, DUDLEY & CRAWFORD, LLC

A T T O R N E Y S A T L A W

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**F. LEE PRICKETT, III**

Practicing Attorney in South Carolina

March 17, 2015

Hon. Jenny Abbott Kitchings  
Clerk of Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
MAR 23 2015  
**SC Court of Appeals**

Re: Deutsche Bank v. Dora S. Morrow  
Appeal from Greenville County  
Case No.: 2010-CP-23-1321  
Appellate Case No.: 2014-002381

To Whom It May Concern:

Please find enclosed an original and six (6) copies of Respondent Edman Hackworth's Motion to Extend the Time to File his Initial Brief and Designation of Matter with Proof of Service in the above referenced matter, as well as our check in the sum of \$25.00 as and for the filing fee.

Thank you for your assistance in this matter. Please do not hesitate to contact our office if you have any questions.

Very truly yours,

KENISON, DUDLEY & CRAWFORD, LLC



Helen Cotrone  
Legal Assistant

Enclosures

cc: David R. Price, Jr.  
Matthew Tillman  
Edman Hackworth

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**KENISON, DUDLEY & CRAWFORD, LLC**  
 ATTORNEYS AT LAW

704 East McBee Avenue ▪ Greenville, South Carolina 29601

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