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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 01 2015
SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2014-001384

FV-I, Inc., in trust for Morgan Stanley Mortgage
Capital Holdings LLC.....Respondent,

vs.

Byron J. Dolan; Lisa S. Dolan; First Citizens Bank and
Trust Company, Inc.; Wells Fargo Bank, N.A.; Branch
Banking and Trust CompanyDefendants,

Of whom

Byron J. Dolan and Lisa S. Dolan, are..... Appellants.

RESPONDENT'S MOTION FOR EXTENSION OF TIME

Charles S. Gwynne Jr. (SC Bar # 73844)
ROGERS TOWNSEND & THOMAS, PC
220 Executive Center Drive (29210)
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(803)771-7900
Attorney for the Respondent
Rogers Townsend & Thomas, PC and its staff are debt collectors

April 1, 2015

Respondent FV-I, Inc., in trust for Morgan Stanley Mortgage Capital Holdings LLC hereby moves for an extension of time to file and serve its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal due to counsel's heavy workload. The present deadline for service and filing of its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal is April 15, 2015.

Respondent's counsel requests a 15 day extension. Respondent's counsel believes that there is good cause to grant the requested extension to April 30, 2015.

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal for an additional fifteen days, to April 30, 2015.

Respectfully submitted,



Charles S. Gwynne Jr. (SC Bar # 73844)
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Trust Company, Inc.; Wells Fargo Bank, N.A.; Branch
Banking and Trust CompanyDefendants,

Of whom

Byron J. Dolan and Lisa S. Dolan, are..... Appellants.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the **RESPONDENT'S MOTION FOR EXTENSION OF TIME** on Appellants Bryon J. Dolan and Lisa S. Dolan and other Defendants by depositing copies of it in the United States Mail, postage prepaid, on April 1, 2015, addressed to its attorneys of record shown on the attachment listing Other Counsel of Record.



Charles S. Gwynne Jr. (SC Bar # 73844)
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April 1, 2015

Other Counsel of Record:

Andrew S. Radeker, Esquire
Harrison & Radeker, P.A.
PO Box 50143
Columbia, SC 29250
(803) 779-2211
Attorney for Respondents

Adam H. Schanz, Esquire
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Attorney for Defendant First Citizens Bank and Trust Company, Inc.

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LICENSED IN SOUTH CAROLINA



April 1, 2015

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

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APR 01 2015

SC Court of Appeals

RE: FV-I, Inc. in trust for Morgan Stanley Mortgage Capital Holdings LLC v. Bryon J. Dolan; Lisa S. Dolan; First Citizens Bank, Wells Fargo Bank, N.A., Branch Banking and Trust Company
Appellate Case # 2014-001384
Our file: 511792.00355

Dear Ms. Kitchings:

Enclosed are the original and seven (7) copies of the Respondent's Motion for Extension of Time, along with a Proof of Service. Please return a filed copy of the document to me. Also included is my firm's check for \$25 representing the filing fee.

By copy of this letter, I am serving a copy of the Respondent's Motion for Extension of Time and Proof of Service on all parties to this appeal.

Thank you for your assistance in this matter.

With kind personal regards, I am

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Charles", written in black ink.

Charles S. Gwynne Jr.

/dm
Enclosures as stated

cc:

Andrew S. Radeker, Esquire
Harrison & Radeker, P.A.
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Adam H. Schanz, Esquire
Crawford & von Keller, LLC
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