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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APR 20 2015
SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2014-002750

Business Loan Center, LLC,.....Respondent,

v.

Lawrence O. Goldstein, Janice R. Goldsteins, and
Regions Bank, of whom Lawrence O. Goldstein and
Janice R. Goldstein are..... Appellants.

**APPELLANTS' THIRD MOTION FOR EXTENSION OF TIME IN WHICH
TO FILE THEIR INITIAL BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

The above-named Appellants, Lawrence O. Goldstein and Janice R. Goldstein, hereby request a thirty (30) day extension of time in which to file their Initial Brief and Designation of Matter To Be Included in the Record on Appeal, which are currently due on April 22, 2015 based on the following facts and circumstances:

1. Business Loan Center, LLC ("Respondent") brought this action against the Goldsteins ("Appellants") to recover on a guaranty agreement which the Appellants executed to secure a loan to Glo-Tex International, Inc. This was a Small Business Administration ("SBA") guaranteed loan. After some of the parties to the loan agreements were adjudicated bankrupts, the action against the Appellants remained.

2. In November 2014, the parties in this matter agreed in principle to resolve this case with the precise terms agreed upon shortly thereafter.

3. We are advised that counsel for the Respondent has diligently sought a decision from SBA.

4. One of the provisions of the settlement agreement requires that Appellants submit an Offer in Compromise ("OIC") to the SBA for the payment amount proposed to satisfy the notes and mortgages that are the subject of this case. The settlement agreement's consummation is contingent upon SBA's approval of the settlement terms.

5. The Appellants, through their counsel, submitted the OIC to SBA via Respondent's counsel in February 2015. The SBA decision-making process regarding the OIC was expected to take approximately 30 to 45 days.

6. On March 24, 2015, Respondent's counsel informed Appellants' counsel that SBA was requiring the Appellants to execute a Request for Transcript of Tax Return. Appellants provided Respondent's counsel the executed form on March 27, 2015.

7. To date, SBA has not notified the parties of its decision regarding Appellants' OIC. Unless and until SBA approves the OIC, the parties cannot execute and implement the terms of the settlement agreement.

8. Despite the delay in receiving a decision from SBA as to Appellants' OIC, the parties desire to minimize the expense and time of preparing the Initial Briefs, Designation of Matter and other pleadings if resolution of the case can be completed through settlement. The parties further do not wish to tax the time and resources of the Court unnecessarily.

9. To provide for adequate time for the government agency's decision, counsel for the Appellants respectfully requests that the Court extend the time in which to file Appellants' Initial Brief and Designation of Matter until May 22, 2015.

10. The Appellants have consulted with counsel for the Respondent, and he consents to this Motion. Appellants are informed and believe that the requested extension will neither prejudice the Respondent nor unduly delay this appeal. Appellants further request that the time limits imposed by the South Carolina Appellate Court Rules be stayed until this Motion has been ruled upon.

HAYNSWORTH SINKLER BOYD, P.A.



Thomas H. Coker, Jr. (S.C. Bar No. 1312)
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Attorney for Appellants

April 16, 2015
Greenville, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Appellate Case No. 2014-002750

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APR 20 2015

SC Court of Appeals

Business Loan Center, LLC,.....Respondent,

v.

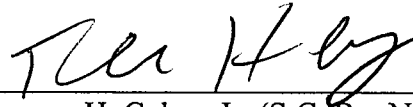
Lawrence O. Goldstein, Janice R. Goldsteins, and
Regions Bank, of whom Lawrence O. Goldstein and
Janice R. Goldstein are..... Appellants.

PROOF OF SERVICE

This is to certify that I caused a copy of the foregoing Appellants' Third Motion for Extension of Time in which To File Their Initial Brief and Designation of Matter To Be Included in the Record on Appeal to be served on Respondent's counsel of record on this the 16th day of April, 2015, by depositing a copy of the same in the United States Mail, first class postage prepaid and addressed as follows:

Joseph O. Smith, Esq.
Roe Cassidy Coats & Price, P.A.
P.O. Box 10529
Greenville, SC 29603

HAYNSWORTH SINKLER BOYD, P.A.



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Attorney for Appellants

April 16, 2015
Greenville, South Carolina

April 16, 2015

RECEIVED
APR 26 2015
SC Court of Appeals

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

RE: *Business Loan Center v. Lawrence O Goldstein, Janice R Goldstein and Regions Bank*
Appellate Case No. 2014-002750
C A. No. 2009-CP-42-5279
HSB File No : 33599.0001

Dear Ms Kitchings

Enclosed in connection with the above matter please find an original and eight (8) copies of Appellants' Third Motion for Extension of Time in which To File Their Initial Brief and Designation of Matter To Be Included in the Record on Appeal as well as the Proof of Service thereof. Also enclosed is a check for the \$25.00 filing fee. I would appreciate your returning two clocked copies of the documents in the enclosed self-addressed envelope.

As outlined in the Motion, the parties in this matter have agreed in principle to settle this case; however, we are still awaiting approval of the proposed settlement agreement from the Small Business Administration. As a result, we respectfully request a thirty-day extension of this deadline to provide for adequate time for the government agency's decision. The deadline, if granted, would change to Friday, May 22, 2015. Counsel for the Respondent has graciously consented to this request and is being copied with this letter and its attachments.

If you have any questions, please do not hesitate to contact me. Thank you for your kind assistance in this matter.

With best regards, I am

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P A.


Thomas H. Coker, Jr.

THCjr.prl
Enclosures

cc: Joseph O. Smith, Esq.

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Haynsworth
Sinkler Boyd, P.A.

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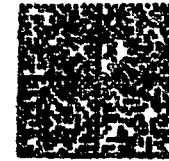
ATTORNEYS AND COUNSELORS AT LAW

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APR 20 2015

SC Court of Appeals

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



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