

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

APR 21 2015

The Honorable Mikell R. Scarborough
Charleston County Master in Equity

SC Court of Appeals

APPELLATE CASE NO. 2014-002590

BRENT E. BENTRIM, Appellant

v.

WELLS FARGO BANK, N.A., Respondent

**POST CONSOLIDATION MOTION FOR EXTENSION OF TIME FOR
FILING INITIAL BRIEF AND DESIGNATION MATTER**

COMES NOW THE Appellant Brent E. Bentrim who by and through his undersigned counsel would move this Honorable Court for an extension to file his Initial Brief and Designation of Matter to be Included in the Record on Appeal, on the following grounds. Originally, this matter encompassed two (2) separate appeals. At the time of consolidation, the Appellant had completed most of the work on the original appeal (2014-002590) but still needed to brief the issues raised in the second appeal (2015-000396).

Following the Consolidation Order of March 26, 2015, Appellant has been working diligently on the combined brief, but respectfully requests one (1) final extension due to the complexity of the issues presented in the "second" appeal which involves a grant of summary judgment on several causes of action. Appellant submits the consolidation is the extenuating factor that militates in favor of the relief requested herein. This would be the functional equivalent a first request for extension on the former "second appeal."

April 20, 2015



Robert B. Varnado
Alexis M. Wimberly
BROWN & VARNADO LLC
P.O. Box 1127
Mount Pleasant, South Carolina 29465
(843) 737-7300
Attorneys for Appellant

Other Counsel of Record:

Charles M. Baker III, Esquire

S. Sterling Laney III, Esquire

John C. Hawk IV, Esquire

WOMBLE CARLYLE SANDRIDGE & RICE, LLP

P.O. Box 999

Charleston, SC 29402

Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Charleston County Master in Equity

APPELLATE CASE NO. 2014-002590

RECEIVED

APR 21 2015

SC Court of Appeals

BRENT E. BENTRIM,Appellant

v.

WELLS FARGO BANK, N.A., Respondent

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Appellant's *Post Consolidation Motion for Extension of time to file the Initial Brief and Designation of Matter* in the above referenced case has been served upon counsel of record by mailing a copy in an envelope properly addressed with postage prepaid this 20th day of April, 2015 to the following:

Other Counsel of Record:
Charles M. Baker III, Esquire
S. Sterling Laney III, Esquire
John C. Hawk IV, Esquire
WOMBLE CARLYLE SANDRIDGE & RICE, LLP
P.O. Box 999
Charleston, SC 29402



Robert B. Varnado
Alexis M. Wimberly
BROWN & VARNADO LLC
P.O. Box 1127
Mount Pleasant, South Carolina 29465
(843) 737-7300
Attorney for Appellant

BROWN & VARNADO LLC

ATTORNEYS AT LAW

103 CHURCH STREET (29464)
POST OFFICE BOX 1127
MT. PLEASANT, SC 29465
OFFICE: (843) 737-7300
FACSIMILE: (843) 654-5109

ROBERT B. VARNADO
DIRECT: (843) 737-7301
EMAIL: rvarnado@brown-varnado.com

April 20, 2015

VIA FEDEX

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

RECEIVED

APR 21 2015

SC Court of Appeals

Re: Brent E. Bentrin v. Wells Fargo Bank, N.A.
Appellate Case No.: 2014-002590
Our File No. 6223-1

Dear Ms. Kitchings:

Enclosed please find Appellant's Post Consolidation Motion for Extension of time to file the Initial Brief Designation of Matter to be included in the Record on Appeal, along with my firm's check in the amount of \$25.00 for the filing fee.

With best regards, I remain

Very truly yours,

BROWN AND VARNADO LLC

Robert B. Varnado

RBV/qi

Enclosure(s): as stated

cc: Charles J. Baker III, Esquire (via email only)
S. Sterling Laney III, Esquire (via email only)
John C. Hawk IV, Esquire (via email only)
Mr. Brent Bentrin (via email only)

BROWN & VARNADO LLC

103 CHURCH STREET (29464)
POST OFFICE BOX 1127
MT. PLEASANT, SC 29465
OFFICE: (843) 737-7300
FACSIMILE: (843) 654-5109

QUINN IBACH
DIRECT: (843) 737-7306
EMAIL: LHAMMOND@brown-varnado.com

FAX

RECEIVED

APR 21 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court

| | | | |
|---------------|---|---------------|--------------------------|
| To: | South Carolina Court of Appeals | From: | Quinn Ibach |
| Fax: | (803) 734-1839 | Pages: | 5 pages with cover sheet |
| Phone: | (803) 734-1890 | Date: | April 21, 2015 |
| Re: | Brent E. Bentrin v. Wells Fargo Bank, N.A. Appellant Case Number: 2014-002590 CC: | | |

Urgent For Review Please Comment Please Reply Please Recycle

Comments: Please find the documents that were sent via Fedex to the Court of Appeals yesterday. We are faxing the same documents today in hopes for a review of the documents prior to the delivery tomorrow morning. Thank you.