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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Master in Equity

Ellis B. Drew, Jr., Master in Equity, Anderson County

Appellate Case No: 2014-000796

RECEIVED
JUN 19 2015
SC Court of Appeals

Corrie Ann Martin, Appellant

v.

Green Tree Servicing, LLC, and John Skipper, as Sheriff of Anderson County, Defendants

Of whom Green Tree Servicing, LLC is Respondent

RETURN TO MOTION FOR EXTENSION TO FILE RECORD ON APPEAL

B. LINDSAY CRAWFORD, III
THEODORE VON KELLER
SARA C. HUTCHINS
CRAWFORD & VON KELLER, LLC
POST OFFICE BOX 4216
COLUMBIA, SOUTH CAROLINA 29240
(803) 790-2626
ATTORNEYS FOR RESPONDENT GREEN TREE
SERVICING LLC

On February 12, 2015, Appellant was granted additional time to file an Initial Brief. Appellant filed her initial brief on March 18, 2015, and on April 15, 2015, Respondent filed its Initial Brief. Pursuant to Rule 210, SCACR, Appellant was to serve a copy of the Record on Appeal on or before May 15, 2015. On June 4, 2015, after Appellant's failure to file the Record on Appeal, Respondent filed a motion to dismiss appeal. Said motion is still pending. Additionally, on June 4, 2015, the Clerk of the South Carolina Court of Appeals issued a letter to Appellant advising her she had ten day to "serve the record on appeal and file the original proof of service, along with a motion requesting permission to serve and file the record on appeal outside of the filing deadlines set by Rule 210 of SCACR." Appellant, on or about June 11, 2015 filed a Motion for Extension to file the record on appeal, however, the record on appeal was not filed as required by the above June 4, 2015 correspondence from the South Carolina Court of Appeals.

ARGUMENT

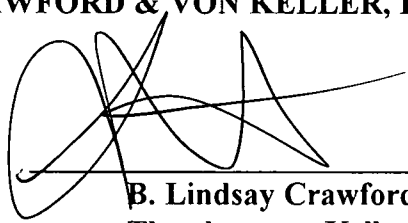
Pursuant to Rule 210, SCACR, that within thirty (30) days after service of the last initial brief, the appellant shall serve a copy of the Record on Appeal on each party. Pursuant to the June 4, 2015 correspondence from the South Carolina Court of Appeals, the Appellant was given ten days from the date of the letter to file the record on appeal, certificate of service and file a motion for permission to serve and file the record on appeal outside the filing deadlines. Appellant has filed only a Motion for Extension with no supporting documentation or authority. Accordingly, Appellant has not timely filed the Record on Appeal or received permission to file the Record on Appeal outside the filing deadlines.

CONCLUSION

For the reasons stated, Respondent respectfully requests that the Court deny the Appellant's Motion for Extension to file the Record on Appeal and further requests that the Court dismiss this matter pursuant to Respondent's pending Motion to Dismiss.

CRAWFORD & VON KELLER, LLC

BY:

A handwritten signature in black ink, appearing to read "B. Lindsay Crawford, III", written over a horizontal line.

**B. Lindsay Crawford, III
Theodore von Keller
Sara C. Hutchins
Post Office Box 4216
Columbia, South Carolina 29240
Telephone: (803) 790-2626
Attorney for Respondent**

June 17, 2015

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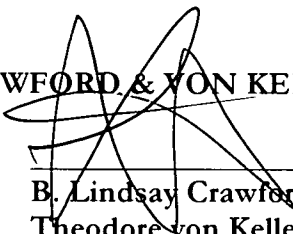
v.

Green Tree Servicing, LLC, and John Skipper, as Sheriff of Anderson County, Defendants
Of whom Green Tree Servicing, LLC is Respondent

PROOF OF SERVICE

I certify that I have served the Respondent's Motion to Dismiss and Memorandum in Support of Respondent's Return to Motion for Extension by depositing a copy of it in the United States Mail, postage prepaid, on June 17, 2015, addressed to its Appellant at the following address:

Corrie A. Martin
Post Office Box 14042
Anderson, SC 29624



CRAWFORD & VON KELLER, LLC

BY:

B. Lindsay Crawford, III
Theodore von Keller

Sara C. Hutchins

Post Office Box 4216

Columbia, South Carolina 29240

(803) 790-2626

Attorneys for Respondent Green Tree Servicing, LLC

Columbia, South Carolina
June 17, 2015

⑤

CRAWFORD & VON KELLER, LLC

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TELEPHONE NUMBER (803) 790-2626

FACSIMILE NUMBER (803) 790-1277

June 17, 2015

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JUN 19 2015

SC Court of Appeals

Honorable Kenneth A. Richstad
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Green Tree Servicing LLC, v. Corrie A. Martin, et al.
Appellate Case No. 2014-000796
Our File No.: 1323.5874

Dear Mr. Richstad

I am enclosing the original and seven (7) copies of the Respondent's Return to Appellant Motion for Extension to file the Record on Appeal and Proof of Service in the above-captioned action. Please file the original and six (6) copies, returning the extra copy to me, clocked, in the envelope provided for your convenience.

By copy of this letter, I am providing Corrie Ann Martin with a copy of this letter and Return.

If you have any questions, please contact me.

Sincerely yours,



Sara C. Hutchins

Enclosures

cc: Corrie Ann Martin (w/enclosures)



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Honorable Kenneth A. Richstad
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