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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHESTER COUNTY
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

RECEIVED

JUN 29 2015

SC Court of Appeals

Case No. 2014-CP-12-00272

Appellate Case No. 2015-001015

TD Bank, N.A., Successor by
merger with
Carolina First Bank,

Respondent,

v.

Joseph L. Huckabee, Jr., a/k/a
Joseph Laverne Huckabee,

Appellant.

MOTION FOR EXTENSION OF TIME

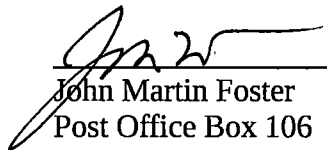
Pursuant to Rules 240 and 263(b), S.C.A.C.R., the Appellant, by his counsel herein, moves this Court for an order granting them an extension of time in which to file their Initial Brief and Designation of Matter to be included in the Record on Appeal, on the grounds stated below:

1. By receipt of the Transcript of Hearing herein on May 26, 2015, the Appellant's Initial Brief and Designation of Matter to be included in the Record is due as of June 25th, 2015.
2. Due to the press of business, counsel for Appellant has been unable to complete the Initial Brief and Designation of Matter to be included in the Record on Appeal within that period.
3. Counsel believes the same can be filed within thirty (30) days, that is: on or before Monday, July 26th, 2015.

The basis of this Motion is the within-cited Rule, the records of this appeal, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellant herein moves this Court for an extension of time in which to file his Initial Brief and Designation of Matter to be included in the Record on Appeal, for a period of thirty (30) days, as set out above, pursuant to Rule 240 and 263(b), S.C.A.C.R.

June 25, 2015



John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellant

Other Counsel of Record:

John T. Moore
Brandon Keith Poston
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 110070
Columbia, S. C. 29211
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(803) 255-9518

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151 Meeting Street, Suite 200
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Attorney for United States: IRS
(843) 266-1600

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PROOF OF SERVICE

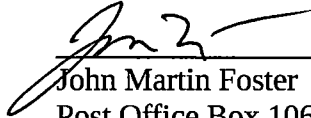
I certify that I have served the Appellant's Motion for Extension of Time dated June 25, 2015, on the following counsel or persons of record:

John T. Moore
Brandon Keith Poston
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 110070
Columbia, S. C. 29211

Matthew J. Modica
U.S. Attorney's Office
151 Meeting Street, Suite 200
Charleston, S. C. 29401

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of those attorney(s) and/or persons set out above, pursuant to Rule 262(b), S.C.A.C.R.

June 25, 2015



John Martin Foster
Post Office Box 106
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803 324-8100
Attorney for Appellant

JOHN MARTIN FOSTER

Attorney at law

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Rock Hill South Carolina 29730 29731-6106 jmfoster@comporium.net

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June 25, 2015

JUN 29 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

SC Court of Appeals

Re: TD Bank, N.A., Successor by merger with Carolina First Bank, Respondent
v. Joseph L. Huckabee, a/k/a Joseph Laverne Huckabee, Jr., Appellant
Case No.: 2014-CP-12-00272
Appeallate Case No. 2015-001015

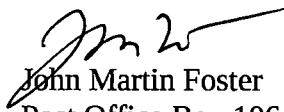
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(a), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellant's Motion for Extension of Time, together with Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$25.00.

By copy of this letter, I am serving the attorney for the Respondent with copies of the said Motion, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely,

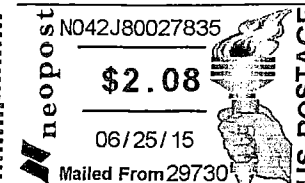
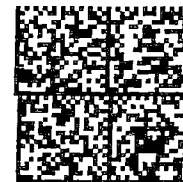


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jmf/
enclosures

cc: John T. Moore
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John Martin Foster Attorney

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Rock Hill SC 29731-6106

TO:

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF THE COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, S.C. 29211

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