

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Mikell Scarborough, Master In Equity

Case No. 2011-CP-10-8421

Court of Appeals Docket 2015-001182

RECEIVED

JUL 08 2015

SC Court of Appeals

Bank of New York Mellon, The as Trustee, et al

Respondent

vs.

Martin H. Seppala, et al

Appellant

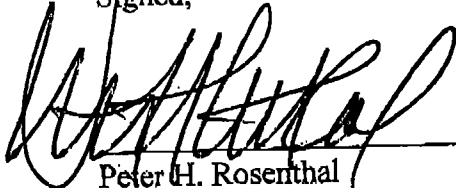
**APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE INITIAL
BRIEF**

Now come the Appellants, Thomas F. True, Trustee of The Jate IV Trust and The Jate IV Trust, in the above captioned matter, and moves for an extension of time to file the Initial Brief of the Appellant until August 10, 2015.

In support hereof, the attorney for the Appellant states that due to extensive workload as well as planned vacation time, meeting the initial date for filing of July 10, 2015 extremely difficult.

In further support of this motion, Appellant's counsel states that this extension is not objected to by the Respondent's counsel as set forth in an email from said counsel to Appellant counsel on July 1, 2015.

Signed,



Peter H. Rosenthal
Attorney for Jate IV Trust

Dated: July 3, 2015

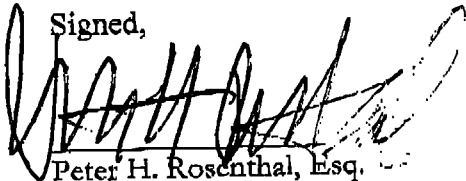
Weymouth, Massachusetts

PROOF OF SERVICE

Pursuant to Rule 262 of the Rules of Appellate Procedure, I hereby certify that I served a copy of the above document, Motion for Extension of Time To File Initial Brief, on Respondent by depositing same with this Proof of Service, in the United States Mail, first class postage prepaid, on July 3, 2015 and addressed as follows:

Magalie A. Creech, Esquire
Finkel Law Firm LLC
P.O. Box 41489
Charleston, SC 29423

Signed,



Peter H. Rosenthal, Esq.
647 Pleasant Street
Weymouth, MA. 02189
(617)571-9177
Attorney for Jate IV Trust, Appellant

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JUL 08 2015

SC Court of Appeals



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2015-07-03

Post Office

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Clerk

04



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\$25.00

Amount

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PETER ROSENTHAL

Address

ATTY JATE IV TRUST

Memo

MOTION TO EXTEND 2015-001182

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PETER H. ROSENTHAL
ATTORNEY AT LAW
647 Pleasant Street
Weymouth, MA. 02189

ALSO ADMITTED IN SOUTH CAROLINA

Phone: (617) 571-9177
Fax: (781) 335-2153

July 8, 2015

RECEIVED

JUL 08 2015

SC Court of Appeals

South Carolina Court of Appeals

Attention Shelby

Fax 803-734-1839

Re: Bank of America, et al v Seppala et al

Court of Appeals Docket # 2015-001182

Dear Shelby,

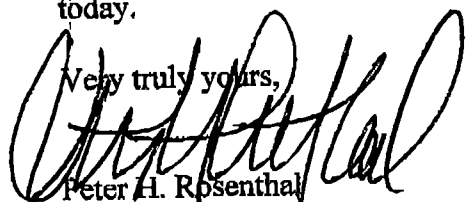
Thanks for your information regarding my questions concerning the above appeal.

On July 3, 2015, I sent, by Priority mail, the attached Notice of Appearance and Motion For Extension of Time. I expected that you would receive these by July 7 at latest.

I just received a notice from the USPS that the package is delayed in their system and you may receive it today.

I am attaching a copy of the mailing for your files and hope the original arrives today.

Very truly yours,



Peter H. Rosenthal
Attorney for Jate IV Trust, Appellant

PETER H. ROSENTHAL
ATTORNEY AT LAW
647 Pleasant Street
Weymouth, MA. 02189

ALSO ADMITTED IN SOUTH CAROLINA

Phone: (617) 571-9177
Fax: (781) 335-2153

RECEIVED

July 3, 2015

JUL 08 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 20201

Re: Bank of New York Mellon, The as Trustee, et al vs. Martin H. Seppala, et al
Appeals Court Docket No. 2015- 001182;
Notice of Appearance and Motion to Extend Time

Dear Madam Clerk,

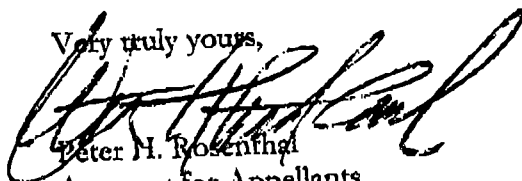
Enclosed please find the following:

- Notice of Appearance with Proof of Service;
- Appellants' Motion For Extension of Time to File Initial Brief with Proof of Service;
- Six copies of the said motion;
- \$25 filing fee to South Carolina Court of Appeals;

The Appellants have sent the required proof of service to the Respondent in this matter.

Please docket and file same with the other papers in this matter.

Very truly yours,



Peter H. Rosenthal
Attorney for Appellants

PHR:smm

Attachments

Copy to Magalie Creech, Esq.