

5

76594

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 13 2015

SC Court of Appeals

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

Respondent

vs.

Martin H. Seppala, et al

Appellant

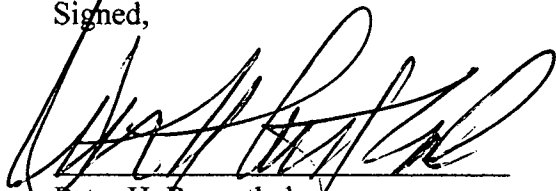
APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

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,

A handwritten signature in black ink, appearing to read 'Peter H. Rosenthal', written over a horizontal line.

Peter H. Rosenthal
Attorney for Jate IV Trust

Dated: July 3, 2015

Weymouth, Massachusetts

5

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:

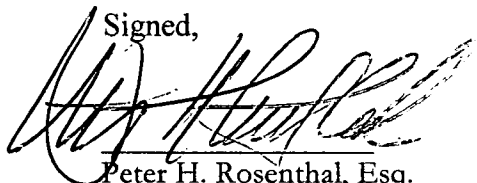
Magalie A. Creech, Esquire
Finkel Law Firm LLC
P.O. Box 41489
Charleston, SC 29423

RECEIVED

JUL 13 2015

SC Court of Appeals

Signed,



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

5

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

ALSO ADMITTED IN SOUTH CAROLINA

Phone: (617) 571-9177
Fax: (781) 335-2158

RECEIVED
JUL 13 2015
SC Court of Appeals

July 3, 2015

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,

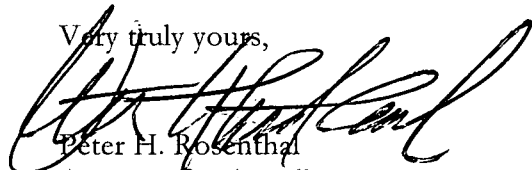
Enclosed please find the following:

- 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.



Flat Rate Envelope

Apply Priority Mail Postage

647 Pleasant Street
Weymouth, MA 02189



1006



U.S. POSTAGE
PAID
SOUTH WEYMOUTH, MA
02190
JUL 03 2015
AMOUNT

\$5.75
00050066-07

RECEIVED

JUL 13 2015



USPS TRACKING #



9114 9012 3080 3385 6922 42

Label 400-Jan-2013
7890-16-000-7948

of Appeals

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

RECEIVED
JUL 13 2015
SC Court of Appeals

29201
29201

EP14H JAN 2011 Outer Dimension: 10 x 5