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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 30 2015

APPEAL FROM SPARTANBURG COUNTY

SC Court of Appeals

Gordon G. Cooper, Master-in-Equity, Seventh Judicial Circuit

Appellate Case No. 2015-001269

Blackwell Property Rentals, LLC,

Plaintiff,

v.

Robert J. Keys, Sr., US Bank
National Association, Howard R.
Burns, Jr., Herman Dodds, Jr.,
Vanessa Twitty, Rosa L. Dodd,
Janice L. Dodd, Brenda G. Dodd,
John Doe and Jane Doe,

Defendants,

US Bank National Association,

Appellant,

v.

County of Spartanburg, South Carolina,

Respondent.

APPELLANT'S MOTION FOR ENLARGEMENT
OF TIME TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER

Undersigned counsel for Appellant US Bank National Association ("US Bank")
respectfully moves before the Court for a thirty (30) day extension of time in which to file the

Initial Brief of Appellant. The Initial Brief of Appellant is due July 30, 2015. If the requested enlargement is granted, the new due date would be August 31, 2015. The grounds for this motion are as follows:

1. The parties are currently undergoing settlement negotiations and Appellant would request an extension so as to promote ongoing negotiations in an attempt to resolve this matter in its entirety. Appellant's counsel requested consent to such an extension from both opposing counsel; however, he has not received a response from counsel for Blackwell Property Rentals or the County of Spartanburg at this time;
2. No prejudice to any party nor undue delay would result from the extension; and
3. Appellant's counsel therefore believes there is good cause to grant the requested thirty (30) day extension to August 31, 2015.

(SIGNATURE ON FOLLOWING PAGE)

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Blackwell Property Rentals, LLC
v. Robert J. Keys, Sr., et al.
Case No. 2015-001269
APPELLANT'S MOTION FOR ENLARGEMENT
OF TIME TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER

Respectfully submitted,

July 27, 2015



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Respondents' counsel:

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*Attorney for Plaintiff, Blackwell Property
Rentals, LLC*

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John Doe and Jane Doe,

Defendants,

US Bank National Association,

Appellant,

v.

County of Spartanburg, South Carolina,

Respondent.

PROOF OF SERVICE

I hereby certify that, on the 27th day of July, 2015, a copy of the *Appellant's Motion for Enlargement of Time to File Initial Brief and Designation of Matter* was served upon the following individual(s) by mailing a copy of the same with sufficient first class postage affixed thereto and

Blackwell Property Rentals, LLC v. Robert J. Keys, Sr.

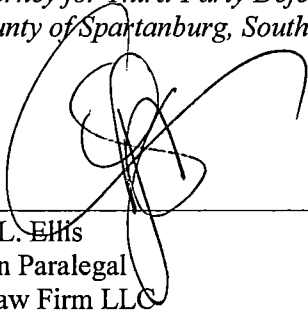
PROOF OF SERVICE

Appellate Case No.: 2015-001269

addressed as follows:

Scott F. Talley, Esq.
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*Attorney for Plaintiff,
Blackwell Property Rentals, LLC*

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Spartanburg, South Carolina 29304-5666
*Attorney for Third-Party Defendant,
County of Spartanburg, South Carolina*



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FINKEL LAW FIRM LLC

JENNIFER L. ELLIS, PARALEGAL
JELLIS@FINKELLLAW.COM

REPLY TO:
CHARLESTON LITIGATION

July 27, 2015

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

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SC Court of Appeals

Re: Blackwell Property Rentals, LLC v. Robert J. Keys, Sr., US Bank National Association, Howard R. Burns, Jr., Herman Dodd, Jr., Vanessa Twitty, Rosa L. Dodd, Janice L. Dodd, Brenda G. Dodd, John Doe and Jane Doe and U.S. Bank National Association v. County of Spartanburg, South Carolina
Appellate Case No.: 2015-001269
Our File No.: 52310.48618

Dear Ms. Kitchings:

Enclosed please find *Appellant's Motion for Enlargement of Time to File Initial Brief and Designation of Matter* and the related *Proof of Service* which needs to be filed in connection with the above referenced matter. We respectfully request that you file-stamped same and return to our office in the enclosed envelope.

I have enclosed check number 5772 in the amount of \$25.00 for the filing fee.

By copy of this letter, I am providing same to all interested parties.

If you have any questions or concerns, please contact me at your convenience.

With kind personal regards, I am

Sincerely,

Jennifer L. Ellis
Litigation Paralegal

:jle
Enclosure

cc: Scott F. Talley, Esq. (w/encl.)
John H. Harris, Esq. (w/encl.)

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file



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