

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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**RECEIVED**

AUG 13 2015

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**S.C. SUPREME COURT**

The Honorable R. Markley Dennis, Jr., Circuit Court Judge

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Appellate Case No. 2015-001345

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Capital Bank, N.A., .....Respondent,

v.

Charles A. Moore a/k/a Charles A.B. Moore.....Petitioner.

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MOTION FOR AN EXTENSION

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Robert A. Kerr, Jr.  
Christopher T. Colwell  
Lesley A. Firestone  
MOORE & VAN ALLEN, PLLC  
78 Wentworth Street  
Charleston, SC 29401  
(843) 579-7000  
Attorneys for Respondent

Other Counsel of Record:

John R. Cantrell, Jr.  
Cantrell Legal, PC  
Post Office Box 1276  
Goose Creek, South Carolina 29445-1276  
(843) 797-2454  
Attorney for Petitioner

Pursuant to Rule 240, SCACR, Respondent requests a twenty (20) day extension to file its Return to Petitioner's Petition for a Writ of Certiorari. The current deadline is August 17, 2015.

This Court has asked parties who seek extensions during the certiorari process to supply grounds for an extension. *See RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, S.C. Sup. Ct. Order Dated July 16, 2014 (Shearhouse Adv. Sh. No. 28 at 1)*. The grounds for this request are that the parties are in the process and close to reaching an agreement on the terms of a settlement.

August 11, 2015

Respectfully submitted,



Robert A. Kerr, Jr.  
Christopher Y. Colwell  
Lesley A. Firestone  
MOORE & VAN ALLEN, P.L.L.C.  
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Charleston, SC 29401  
(843) 579-7000

Attorneys for Respondent

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v.

Charles A. Moore a/k/a Charles A.B. Moore,.....Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on August 11, 2015, a true and correct copy of the **Motion for Extension** in the above-referenced matter was served on the parties listed below, by facsimile and by United States mail, proper postage prepaid addressed as follows:

John R. Cantrell, Jr., Esq.  
Cantrell Legal, PC  
P.O. Box 1276  
Goose Creek, SC 29445-1276



Robert A. Kerr, Jr.  
Christopher T. Colwell  
Lesley A. Firestone  
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78 Wentworth Street  
Charleston, SC 29401  
(843) 579-7000  
Attorneys for Respondent

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Moore & Van Allen

August 11, 2015

AUG 13 2015

Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, SC 29211

S.C. SUPREME COURT

Lesley A. Firestone  
Attorney at Law

T 843 579 7027  
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Moore & Van Allen PLLC

78 Wentworth St.  
Charleston, SC 29401-1428

Mailing Address:  
Post Office Box 22828  
Charleston, SC 29413-2828

**RE: Capital Bank, N.A., v. Charles A. Moore, et al.  
Of whom Capital Bank, N.A., is Respondent  
Appellate Case No. 2015-001345**

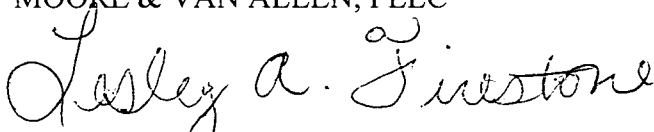
Dear Mr. Shearouse:

Please find enclosed the original and seven (7) copies of the Motion for Extension in regards to this case. I have also enclosed a proof of service of this document on counsel for the petitioner and a check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to me in the enclosed self-addressed stamped envelope.

Thank you for your attention to this matter. If you need any additional information, please do not hesitate to contact me.

Yours very truly,

MOORE & VAN ALLEN, PLLC

  
Lesley A. Firestone

LAF/ws

Enclosures

cc: John R. Cantrell, Jr., Esq.

Charlotte, NC  
Research Triangle Park, NC  
Charleston, SC



# The Supreme Court of South Carolina

Lesley Anne Firestone  
78 Wentworth St.  
PO Box 22828  
Charleston SC 29413-2828

08/13/2015

## RECEIPT #76927

**Case No:** 2015-001345  
**Case Short Title:** Capital Bank v. Charles Moore  
**Event:** Motion - Extension of Time (1st)  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 31930  
**Check/Money Order Date:** 08/11/2015  
**Comments:**

*Leaked*