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THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

SEP 04 2015

Hon. S. Jackson Kimball III  
Master in Equity

SC Court of Appeals

Case no. 2011-CP-46-250

Bank of America, N.A., as successor by merger to BAC Home Loans  
Servicing, LP, f/k/a/ Countrywide Home Loans Servicing, LP FKA  
Countrywide Home Loans Servicing, LP.....RESPONDENT

vs.

Michelle Minardi and Ameris Bank,  
of whom Defendant Michelle Minardi is the .....APPELLANT

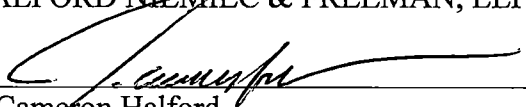
APPELLANT MOTION FOR EXTENSION  
TO FILE INITIAL BRIEF AND  
DESIGNATION OF MATTER

Counsel for Appellant hereby respectfully moves the court for an extension of time  
deadline for Appellant to file Appellant's Initial Brief and proposed Designation of  
Matter to be Included for the Record on Appeal. This motion is made for the purpose of  
reviewing and eliminating matters from the court record (and copying) that are not  
required for the appeal, documents spanning years 2011 to 2015. Counsel has attempted  
to communicate with opposing counsel regarding the continuance, with no response as of  
the filing of this motion. The extension is also being requested for additional time due to

personal and family medical obligations of the undersigned's family scheduled to occur on Wednesday September 2, 2015 and prays that the court grant thirty days extension.

Respectfully submitted,

HALFORD NIEMEYER & FREEMAN, LLP



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J. Cameron Halford

S.C. Bar 17184

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Attorney for Appellant Michelle Minardi

Other counsel of record:

Carolina Glenn, Esq.

Brock & Scott, PLLC

3800 Fernandina Road, Suite 110

Columbia, South Carolina 29210

Attorney for Bank of America, N.A.

PROOF OF SERVICE

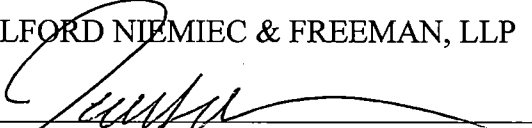
I hereby certify that I am the attorney for the Appellant Michelle Minardi in the above captioned case and that I did on September 1, 2015 serve a copy of the foregoing APPELLANT MOTION TO EXTEND DEADLINE TO SERVE APPELLANTS' INITIAL BRIEF AND DESIGNATION OF MATTER on counsel for the Plaintiff, identified below, by e-mail delivery and U.S. mail, postage prepaid, and addressed as follows:

Carolina Glenn, Esq.  
Brock & Scott, PLLC  
3800 Fernandina Road  
Columbia, South Carolina 29201  
*Attorneys for Bank of America, N.A.*

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SC Court of Appeals

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\_\_\_\_\_  
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Attorney for Appellant Michelle Minardi

September 1, 2015  
Fort Mill, South Carolina

LAW OFFICES

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September 1, 2015

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SC Court of Appeals

Jenny Abbott Kitchings, Clerk of Court  
The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201


Re: Bank of America, N.A., as successor by merger to BAC Home Loans  
Servicing, LP, f/k/a Countrywide Home Loans Servicing, LP f/k/a  
Countrywide Home Loans Servicing, LP vs. Michelle Minardi and  
Ameris Bank  
Case No.: 2011-CP-46-250

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of the Appellant's Motion for Extension to file Initial Brief and Designation of Matter and Proof of Service regarding the above-referenced matter. In this regard, I would appreciate your filing these documents and returning a clocked copy to my office in the envelope provided. I have also enclosed my check in the amount of \$25.00 for the cost of filing. If you have any questions regarding the enclosed or this matter, please do not hesitate to contact my office.

With kind personal regards, I am

Sincerely,

  
J. Cameron Halford

JCH:tml

Enclosures

cc: Ms. Michelle Minardi  
w/enclosure  
Caroline Glenn, Attorney at Law  
w/enclosure

^ MEDIATOR AND ARBITRATOR

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