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STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Case No. 2008-CP-23-3665

Edward W. Miller, Circuit Court Judge

APPELLATE CASE NO. 2013-002676

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SEP 10 2015
SC Court of Appeals

William F. Tomz and Francis W. Tomz, Individually
and as Class Representatives, Respondents.

v.

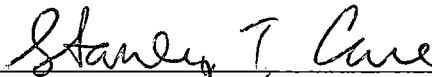
Capital Investment Funding, LLC, and Arthur M. Field, Defendants, Of Whom Capital
Investment Funding, LLC, by and through its Receiver, Jerry T. Saad, is a Respondent, and
Arthur M. Field is the Appellant.

**RESPONDENTS' MOTION FOR ADDITIONAL EXTENSION OF TIME TO
FILE INITIAL BRIEF**

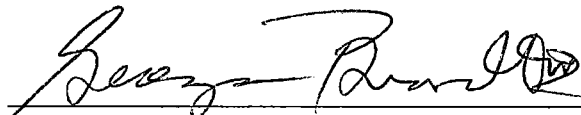
William F. Tomz and Francis W. Tomz, Individually and as Class Representatives,
Respondents, and Capital Investment Funding, LLC, by and through its Receiver, Jerry T. Saad,
Respondent, hereby move for an additional 30-day extension of time in which to file Respondents'
Initial Brief from September 30, 2015 until October 30, 2015. The undersigned attorneys for these
Respondents base this motion on the fact that their Deposition, Mediation and Court schedules,
including a trial in the Federal Court since being served with the Appellant's Initial Brief and the
Order of this Court allowing Capital Investment Funding, LLC to intervene as a Respondent in this
action, have been, and continue to be, heavy with previously scheduled matters and will not allow

ample time to complete the reply brief in the time currently allowed. In light of the foregoing, the undersigned respectfully submits that they have demonstrated good cause for requesting this extension of time.

Respectfully submitted,



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Attorney for Respondent Capital Investment
Funding, LLC, by and through its Receiver, Jerry T.
Saad

September 9, 2015

STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Case No. 2008-CP-23-3665

SEP 10 2015
SC Court of Appeals

Edward W. Miller, Circuit Court Judge

APPELLATE CASE NO. 2013-002676

William F. Tomz and Francis W. Tomz, Individually
and as Class Representatives, Respondents.

v.


Capital Investment Funding, LLC, and Arthur M. Field, Defendants, Of Whom Capital
Investment Funding, LLC, by and through its Receiver, Jerry T. Saad, is Respondent, and Arthur
M. Field is the Appellant.

PROOF OF SERVICE

I, the undersigned attorney for Respondent Capital Investment Funding, LLC, by and through
its Receiver, Jerry T. Saad, do hereby certify that I have served the South Carolina Court of Appeals
with one original and seven copies of the **RESPONDENTS CAPITAL INVESTMENT
FUNDING, LLC, AND WILLIAM AND FRANCIS W. TOMZ MOTION FOR
ADDITIONAL EXTENSION OF TIME TO FILE INITIAL BRIEF**, by UPS overnight service,
to her address shown below, and have served a copy of the aforementioned Motion on The
Honorable Jenny Abbott Kitchings, Clerk of Court for the South Carolina Court of Appeals, and
Bradford N. Martin, Esquire and Laura W. H. Teer, Esquire, attorneys for Appellant Arthur M. Field,
by United States First Class Mail to their respective address (B.) shown below:

A. The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

B. Bradford N. Martin, Esquire
Laura W. H. Teer, Esquire
Bradford N. Martin & Associates, PA
P.O. Box 10410
Greenville, SC 29603

By: 
George Brandt, III SC Bar No. 00855
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(864) 583-5144
Attorney for Respondent

September 9, 2015

Henderson Brandt & Vieth, P.A.

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*Also licensed in North Carolina

Attorneys At Law

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September 9, 2015

SEP 10 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

RE: William Tomz et al v. Capital Investment Funding, LLC et al
Appellate Case No. 2013-002676

Dear Ms. Kitchings:

Enclosed please find the following:

- (a) An original and seven copies of the Motion for Additional Extension of Time to File Initial Brief of my client, Respondent Capital Investment Funding, LLC, by and through its Receiver, Jerry T. Saad, and Respondents William F. Tomz and Francis W. Tomz, Individually and as Class Representatives;
- (b) An original and two copies of the Proof of Service on all counsel;
- (c) A stamped, self-addressed envelope.

Assuming you find the attached to be satisfactory, I would appreciate your filing the above documents and returning to me a clocked copy of the Motion and the Proof of Service for my records. For your convenience, I have enclosed a return envelope for your use. By copy of this letter, as indicated by the attached Proof of Service, I am serving a copy of the attached upon the attorneys for all parties. Please do not hesitate to contact me if you have any questions or need additional information.

Very truly yours,



George Brandt, III
For: HENDERSON, BRANDT & VIETH, P.A.
Direct Line: 864-583-5144
Fax Line: 864-582-2927
E-Mail: gbrandt@hbvlaw.com

GB,III/msl
Enclosures

cc: Bradford N. Martin, Esquire
Laura W. H. Teer, Esquire
Stanley T. Case, Esquire

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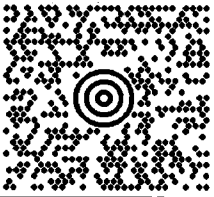



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