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THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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SC Court of Appeals

APPEAL FROM AIKEN COUNTY

SECOND JUDICIAL CIRCUIT

COURT OF COMMON PLEAS

REFeree JAMES MARTIN HARVEY, JR

Trial court Case NO. 2012-CP-02-00699

APPELLATE CASE NO. 2015-001119

BANK OF AMERICA, N.A.

)

APPELLANT'S MOTION

BAC HOME LOANS SERVICING , LP

TO EXTEND TIME TO FILE

fka COUNTRYWIDE HOME LOANS

ANSWER TO RESPONDENT

SERVICING, LP

INITIAL BRIEF

RESPONDENT

V.

CAROLYN S. DEANER

APPELLANT

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**APPELLANT'S MOTION TO EXTEND TIME TO FILE ANSWER TO RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD OF APPEAL**

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The Appellant, Pro Se, pursuant to RULE 263, SCACR, hereby MOVES FOR AN EXTENSION OF TIME TO FILE THE ANSWER TO THE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD OF APPEAL.

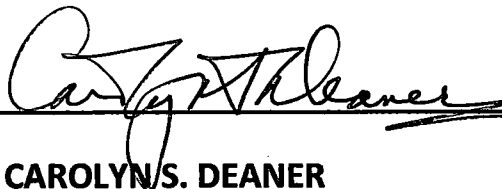
The grounds for this motion is that the Appellant Pro Se requires additional time to research, investigate and respond to the Respondent's Statement of Facts and answer appropriately with matter of law facts from the trial and connected previous hearings. Appellant needs a 30 day extension from the date of service of this Motion.

Appellant requests an extension of time up to and including October 8, 2015, to also await trial court's five Orders on last hearing including Appellant's Motion to Proceed In Forma Pauperis, and in addition, the Notice to Special Referee Harvey on Defendant's Move on the Court and Motion To Order All Trust Documents of Defendant's FANNIE MAE REMIC 2007-91 TRUST.

Respectfully submitted , this 8<sup>th</sup> day of September, 2015.

North Augusta, SC

Aiken County



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**CAROLYN S. DEANER**

**704 KERSHAW DRIVE**

**NORTH AUGUSTA (BELVEDERE), SC 29841**

**PRO SE/APPELLANT**

**(706) 399-5496**

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing APPELLANT's MOTION TO EXTEND TIME TO FILE ANSWER TO THE RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL has been served upon the parties in this action by mailing a copy thereof, postage prepaid to the following:

Janiere E. Taylor, Robert A. Muckenfuss, and Trent Grissom

MCGUIREWOODS LLP

201 North Tryon Street, Suite 3000

Charlotte, NC 28202

CHARLIE GWYNNE, Esq.

Rogers Townsend and Thomas

P. O. Box 100200

Columbia, SC 29202

This the 8<sup>th</sup> day of September 2015

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Carolyn S. Deaner, Pro Se

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SC Court of Appeals

SEPTEMBER 8, 2015

TO: The Honorable Jenny Abbott Kitchings

South Carolina Court to Appeals

1015 Sumter Street

Columbia, SC 29201

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SC Court of Appeals

RE: Bank of America, N.A. v. Carolyn S. Deaner

Appellate Case No. 2015-001119

Dear Ms. Kitchings:

Please find enclosed an original and six (6) copies of the Appellant's Motion To Extend Time To File Answer To Respondent's Initial Brief. Also, please find enclosed a check in the amount of \$25.00 for the filing fee along with a self addressed stamped envelope for return of the filed copies.

In addition, I am serving the counsel for the Respondent a copy.

Thank you for your time and consideration in this matter. Please contact me should you have any questions or need more information.

Cordially,  
  
Carolyn S. Deaner

Pro Se

cc: Janiere Taylor, Charlie Gwynne, Esq.

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FROM: CAROLYN S. DEANER  
704 KERSHAW DRIVE  
NORTH AUGUSTA, SC 29841

TO: MS. JENNY A. KITCHINGS  
SC COURT OF APPEALS  
1015 SUMTER STREET  
COLUMBIA, SC 29201

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