

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

APPEAL FROM YORK COUNTY
Court of Common Pleas

Hon. S. Jackson Kimball III
Master in Equity

Case No. 2011-CP-46-250
Appellant Case No.: 2015-001857

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SEP 14 2015
SC Court of Appeals

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

vs.

Michelle Minardi and Ameris Bank, Defendants,

Of whom Defendant Michelle Minardi is theAPPELLANT

APPELLANT MOTION REQUESTING
EXTENSION OF TIME TO ORDER JUNE 30, 2015
TRANSCRIPT OUTSIDE OF RULE 207 DEADLINES

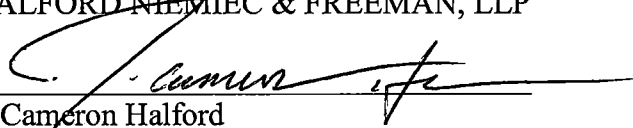
Counsel for Appellant hereby respectfully moves the court for an Order allowing Appellant permission to order the June 30, 2015 transcript outside of the Rule 207(a)(1) SCACR ten (10) day deadline on the grounds of inadvertent error, Appellant Counsel having ordered two (2) of three (3) prior transcripts in this case from hearings before the York County Master in Equity.¹ Counsel inadvertently did not order the transcript from

¹ The three transcripts leading up to the Notice of Appeal in this case were hearings occurring February 18, 2015; April 14, 2015 and the Rule 59(e) motion by Defendant heard, lastly, on June 30, 2015; the first having had to be reproduced from court audio, as no court reporter was present on February 18, 2015. Counsel inadvertently believed he had requested all transcripts prior to the Notice of Appeal.

the June 30, 2015 concurrently with the Notice of Appeal, or Rule 207 time deadlines, believing all transcripts in the case had been procured. Counsel would further show this matter involves a year 2011 involving five (5) contested hearings on compulsory reference issues prior to the Notice of Appeal being filed in the case. Counsel for Appellant has attached its letter requesting said transcript, and respectfully prays that the court of appeals grant the relief sought.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP



J. Cameron Halford
S.C. Bar 17184
238 Rockmont Drive
Fort Mill, South Carolina 29708
803-547-6618
803-547-6638 fax
cam@fortmilllaw.com
Attorney for Appellant Michelle Minardi

Other counsel of record:

Caroline Glenn, Esq.
Brock & Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, South Carolina 29210

Attorney for Bank of America, N.A.

PROOF OF SERVICE

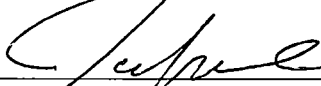
I hereby certify that I am the attorney for the Appellant Michelle Minardi in the above captioned case and that I did on September 9, 2015 serve a copy of the foregoing APPELLANT MOTION FOR REQUESTING EXTENSION AND PERMISSION TO ORDER TRANSCRIPT OUTSIDE DEADLINES OF RULE 207(a)(1) on counsel for the Plaintiff, identified below, by 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

HALFORD NIEMIEC & FREEMAN, LLP



J. Cameron Halford
S.C. Bar No. 17184
238 Rockmont Drive
Fort Mill, S.C. 29708
803-547-6618
803-547-6638 fax
cam@fortmilllaw.com

Attorney for Appellant Michelle Minardi

September 9, 2015
Fort Mill, South Carolina

LAW OFFICES

HALFORD, NIEMIEC & FREEMAN, L.L.P.

A Registered South Carolina Limited Liability Partnership Including Limited Liability Companies

238 ROCKMONT DRIVE

FORT MILL, SOUTH CAROLINA 29708

TELEPHONE: 803-547-6618

FACSIMILE: 803-547-6638

J. Cameron Halford ^
Matthew R. Niemiec
P. John Freeman

cam@fortmilllaw.com
matt@fortmilllaw.com
jfreeman@fortmilllaw.com

September 9, 2015

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SEP 14 2015

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 vs.
Michelle Minardi and Ameris Bank
Case No.: 2011-CP-46-250
Appellate Case No.: 2015-001857

Dear Ms. Kitchings:

Enclosed please find the original and one copy of the Appellant's Motion Requesting Extension of Time to Order June 30, 2015 Transcript Outside of Rule 207 Deadlines with a copy of the letter to the Court Reporter, Cathy Young, along with the Certificate of Service regarding the above-referenced matter. If you have any questions regarding the enclosed or this matter or need anything further from my office, please do not hesitate to contact my office.

With kind personal regards, I am

Sincerely,


J. Cameron Halford

JCH:tml

Enclosure

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

^ MEDIATOR AND ARBITRATOR

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South Carolina Court of Appeals
1220 Senate Street
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