

77242

**THE STATE OF SOUTH CAROLINA**  
In The Court of Appeals

**RECEIVED**

SEP 14 2015  
SC Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

James B. Jackson, Jr., Master in Equity

Case No. 2015-001112

South Carolina Federal Credit Union,

Respondent

v.

Dorothy Harley Sistrunk aka Dorothy  
Harley-Sistrunk aka Dorothy A. Harley  
aka Dorothy Sistrunk

Appellant.

**APPELLANT'S MOTION TO EXTEND TIME TO REPLY**

September 10, 2015

Dorothy Harley Sistrunk  
423 Bayne Street  
Orangeburg, South Carolina 29115  
Ph: (803) 268-0716  
Fx: (803) 534-6727

Moore & Van Allen, PLLC  
Reid E. Dyer  
78 Wentworth Street  
Post Office Box 22828 (29413-2828)  
Charleston, SC 29401-1428  
Ph: (843) 579-7045  
Fx: (843) 579-8754  
Attorneys for Respondent

Comes now the Appellant, Dorothy Harley Sistrunk, to file a Motion to Extend Time to *Reply to the Respondent; Initial Brief* i.e., South Carolina Federal Credit Union, Respondent v. Dorothy Harley Sistrunk, Appellant (Refer to the cover for aka's if needed) - Case No. 2015-001112; that was retrieved from the mailbox at 423 Bayne Street on August 30, 2015. Please note the *Respondent's Initial Brief* is dated August 21, 2015.

### WHY A MOTION TO EXTEND TIME IS NEEDED

1. The first reason why a motion to extend time to reply is needed is the date on which the *Respondent's Initial Brief* was retrieved from the mailbox at 423 Bayne Street in Orangeburg, South Carolina. The *Respondent's Initial Brief* is dated August 21, 2015. However, it was not retrieved until August 30, 2015.

2. **Reason #2:** After a preliminary examination of the *Initial Brief*, the Appellant realized the Respondent's explanations on pages 10 - 11 will require more time to research the matter before filing a reply. The initial research, based on South Carolina precedents, produce no results. Therefore, case law files from federal courts; and state Appellate Courts, other than South Carolina, will have to be researched.

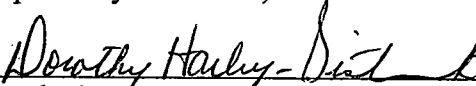
3. **Reason #3:** The Appellant is Pro Se, and as stated in previous briefs filed in the Lower Court and the Appellate Court, the Appellant's husband does the research for her with his unique search string method. Therefore, it may take days to find a search string that can produce supporting case law.

### CONCLUSION

For all the reasons stated above, the Appellate Court should grant the Appellant's Motion to Extend Time to October 21, 2015..

September 10, 2015

Respectfully submitted,

/s/   
Dorothy Harley Sistrunk  
423 Bayne Street  
Orangeburg, South Carolina 29115  
(803) 268-0716

**RECEIVED**

SEP 14 2015

SC Court of Appeals

**NOTARY CERTIFICATION**

**IN WITNESS WHEREOF**, The undersigned, being duly **SWORN**, declares under the **PENALTY OF PERJURY** that the facts in her "Motion to Extend Time" are true and correct. When it comes to matters stated therein that are based upon information and/or belief; as to those matters, she believes them to be true. Accordingly, based on the stated facts; Re: Appellate Case No. 2015-001112 and Civil Action Case No. 2011-CP-38-1392, will sign, seal and execute her attestations on this 10 day of September in the year 2015 in the City and County of Orangeburg, in the State of South Carolina.

Rule 11(c), SCRCP clearly states in pertinent parts; "[A]ffidavits or verifications authorized or permitted under these Rules shall be written statements or declarations by a party or his attorney of record or of a witness, sworn to or affirmed before an officer authorized to administer oaths, that the affiant knows the facts stated to be true of his own knowledge, except as to those matters stated on information and belief and as to those matters that he believes them to be true."

Appellant's Signature: Dorothy Sisstrunk

Notary's Signature as Witness (1): Kim L. Paul

**Signed, Sealed, Executed and Delivered in the Presence of:**

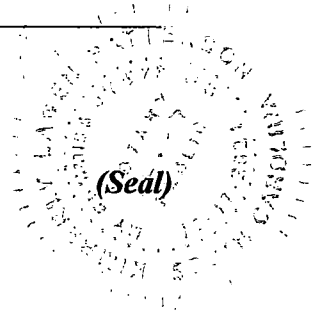
**STATE OF SOUTH CAROLINA  
COUNTY OF ORANGEBURG**

On Sept. 10, 2015 before me appeared Dorothy Sisstrunk and proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to the within instrument and acknowledged to me that she is executing the same in her authorized capacity, and by her signature on her "Motion to Extend Time" and this Notary Certification presents this document to the Appellate Court.

**WITNESS My Hand and Official Seal.**

Notary's Signature Kim L. Paul

Commission Expires 10-17-24



THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

James B. Jackson, Jr., Master in Equity

Case No. 2015-001112

RECEIVED

SEP 14 2015

SC Court of Appeals

South Carolina Federal Credit Union

Respondent,

v.

Dorothy Harley Sistrunk a/k/a  
Dorothy Harley-Sistrunk a/k/a  
Dorothy A. Harley a/k/a  
Dorothy Sistrunk

Appellant.

**PROOF OF SERVICE**

I certify that I have served a copy the Appellant's Motion to Extend Time to October 21, 2015 by depositing a copy of the Motion to Extend Time with United Parcel Service, postage prepaid, on September 10, 2015, addressed to SCFCU's attorney/s of record listed below.

*1/s Dorothy Sistrunk*  
\_\_\_\_\_  
Dorothy Sistrunk  
423 Bayne Street  
Orangeburg, South Carolina 29115  
(803) 268-0716  
*Pro Se*

cc: Moore & Van Allen, PLLC  
Reid E. Dyer  
78 Wentworth Street  
Office Box 22828 (29413-2828)  
Charleston, SC 29401-1428  
Ph: 843-579-7045 Fx: 843-579-8754  
Attorney/s for Respondent South Carolina Federal Credit Union (SCFCU)

 **Dorothy Sistrunk**

423 Bayne Street • Orangeburg, SC 29115 • Ph: 803-268-0716 • Fx: 803-534-6727

**NOTICE OF MOTION TO EXTEND TIME TO  
REPLY TO RESPONDENT'S INITIAL BRIEF TO OCTOBER 21, 2015**

September 10, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
SEP 14 2015  
SC Court of Appeals

RE: South Carolina Federal Credit Union, Respondent v. Dorothy Harley  
Sistrunk, Appellant – Case No. 2011-CP-38-1392 / 2015-001112

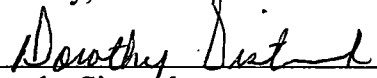
Dear Ms. Kitchings:

Enclosed is my Motion to Extend Time to Reply to *Respondent's Initial Brief* to October 21, 2015. The Brief was not retrieved from the mailbox at 423 Bayne Street until August 30, 2015. I have major personal issues right now. My mother's heart condition, my son's kneecap and my husband's groin injury. Also enclosed are:

- (1) **Proof of Service** that the Motion to Extend Time has been sent to the Respondent, South Carolina Federal Credit Union attorney of record that is listed below. And.....
- (2) My personal check in the amount of \$25.00 is attached for the filing fee of \$25.00.

Thank you for your efforts on my behalf,

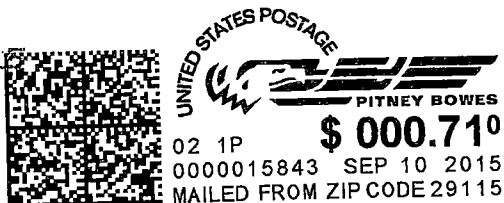
Sincerely,

/s/   
Dorothy Sistrunk  
423 Bayne Street  
Orangeburg, South Carolina 29115  
(803) 268-0716  
*Pro Se*

cc: Moore & Van Allen, PLLC  
Reid E. Dyer  
78 Wentworth Street  
Office Box 22828 (29413-2828)  
Charleston, SC 29401-1428  
Ph: 843-579-7045 Fx: 843-579-8754  
Attorney/s for Respondent South Carolina Federal Credit Union (SCFCU)

Dorothy Harley-Sistrunk  
423 Bayne Street  
Orangeburg, SC 29115

COLUMBIA  
SC 290  
10 SEP '15  
PM 3 L



The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

SEP 14 2015

SC Court of Appeals

29211162929

