

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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OCT 09 2015
SC Court of Appeals

Townes at Pelham Owners' Association, Inc.,
Respondent,

v.

Donna Boyd, Bank of America, N.A. by Assignment
From Mortgage Electronic Registration Systems,
Defendants,

And

Donna Boyd, Third Party Plaintiff

v.

Eric Hedrick, in his Individual and Official Capacity as
Owner or President of Cornerstone Realty, Inc. and
Cornerstone Realty, Inc., Third Party Defendants,

Of whom Donna Boyd is the Appellant

Appellate Case No. 2014-000701

The Honorable Charles B. Simmons, Jr.
Greenville County

Trial Court Case No. 2102CP2303686

MOTION TO AMEND

NOW COMES, the Appellant, Donna Boyd moves to amend motion. The Appellant motions for a (30) day continuance to file its final brief and record on appeal. This motion is based on the following facts:

1) The Appellant on October 1, 2015, received notice of the Court's decision by mail that the motion for continuance to file its final brief and record on appeal was extended

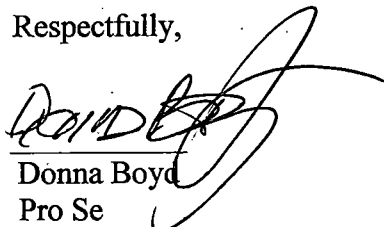
until October 1, 2015. The Appellant noted that the ORDER was filed September 28, 2015.

2) The Respondent filed a motion for a thirty (30) day continuance on October 29, 2014, asserting that it needed to associate other counsel to prepare its initial brief and designation of matter. The Respondent was granted an extension until December 8, 2014. The Respondent on December 1, 2014, moved again for a ninety (90) day extension to file its initial brief and designation of matter. The Respondent's motion for a ninety-day extension was denied on January 23, 2015, and the Respondent was given another thirty (30) days to file its brief and designation of matter extending it until March 9, 2015. And on February 19, 2015, the Respondent filed another motion asking that the Court hold the Appellant's appeal in abeyance.

However, the Respondent's motion to hold appeal in abeyance was not denied until May 22, 2015, essentially affording the Respondent its ninety (90) day extension. After, the Appellant on May 10, 2015, informed the Court as requested that her house had not sold on April 6, 2015. The Respondent on May 22, 2015, was afforded another thirty (30) days to submit its initial brief and designation of matter, extending it until July 7, 2015. Between March 9, 2015, and July 7, 2015, the Respondent was afforded approximately four months to submit its initial brief and designation of matter.

However, the Respondent on June 19, 2015, attempted to submit its designation of matter without an initial brief, asserting that it would not be submitting its initial brief. It is evident that the Respondent did not intend to submit its initial brief and designation of matter and its several motions were clearly an attempt to thwart the judicial process and waste the Court's time and other resources. The Appellant requests additional time to prepare its final brief and record on appeal. Also, Appellant respectfully requests that the \$25.00 filing fee sent on October 1, 2015, be applied to this motion to amend. I apologize to this Honorable Court for any inconvenience.

Respectfully,



Donna Boyd
Pro Se
Post Office Box 1168
Mauldin, SC 29662

Mauldin, South Carolina
October 2, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Circuit Court Judge

Case No. 2014-000701

Townes at Pelham Owners'
Association, Inc.

Respondent,

v.

Donna Boyd,

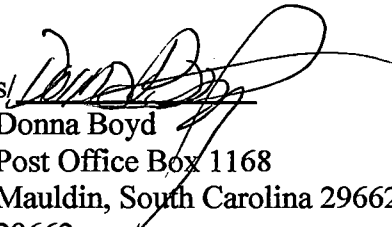
Appellant.

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PROOF OF SERVICE

I certify that I have served the Motion to Amend for the above referenced action by facsimile and overnight delivery to the South Carolina Court of Appeals at 1015 Sumter Street, Columbia, South Carolina, 29201 and by depositing a copy of it in the United States Mail, postage prepaid, on Tuesday, October 6, addressed to the Respondent, J. Chris Brown, 505 W. Butler Road, Greenville, South Carolina 29607.

October 6, 2015

s/ 
Donna Boyd
Post Office Box 1168
Mauldin, South Carolina 29662
29662

DB
P.O. Box 1168
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29662

GREENVILLE SC 296

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Clerk of Court
Honorable Jenny Abbott ^{King}
South Carolina Court of Appeals
Post office Box 11629
Columbia, SC 29211



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