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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DILLON COUNTY
Court of Common Pleas

Harry R. Easterling, Jr., Special Referee

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OCT 15 2015
SC Court of Appeals

Case No. 2012-CP-17-0060
Court of Appeals No. 2015-000985

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

v.

Shawn L. Bethea; South Carolina Department of Motor Vehicles, Defendants,
Of whom Shawn L. Bethea is the.....Appellant.

**MOTION TO COMPEL APPELLANT TO CORRECT
RECORD ON APPEAL AND FOR EXTENSION OF TIME
TO FILE FINAL BRIEF AND MEMORANDUM IN SUPPORT**

Trent M. Grissom
S.C. Bar No. 77718
MCGUIREWOODS LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2000
Fax: (704) 444-8738

Attorney for Respondent

Date: October 14, 2015

Pursuant to Rules 210(c) and 263(b) of the South Carolina Appellate Court Rules, Respondent Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP f/k/a Countrywide Home Loan Servicing, LP (Respondent) respectfully requests that the Court issue an order compelling Appellant Shawn L. Bethea (Appellant) to number his record on appeal "consecutively beginning with the index" as required by Rule 210(c). At this time, the record on appeal filed by Appellant does not comply with the requirements of Rule 210(c) because the record is not numbered consecutively beginning with the index. Without compliance with Rule 210(c), Appellant and Respondent cannot comply with Rule 211(b)'s reference to record requirement. To this end, there is good cause to grant this motion and to extend Respondent's deadline to file a final brief to 20 days after Appellant's service and filing of an amended record on appeal that complies with Rule 210(c).

WHEREFORE, for good cause shown, Respondent prays that the Court issue an order compelling Appellant to serve and file an amended record on appeal that complies with the numbering requirements of Rule 210(c) and provides Respondent with an extension of time to file a final brief within 20 days of Appellant's service and filing of an amended record on appeal.

Trent M. Grissom by Attorney Brian A. Calab
Trent M. Grissom (SC BAR 72005) is authorized
S.C. Bar No. 77718 in writing on Oct. 14, 2015
MCGUIREWOODS LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2000
Fax: (704) 444-8738

Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that this designation of matter for record on appeal was served on Appellant by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Shawn L. Bethea
1317 Gordonville Court
Dillon, SC 29536

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This the 14th day of October, 2015.

Trent M. Grissom by Attorney Brian A. Calab
Trent M. Grissom (SC BAR 72009) as authorized
in writing on Oct. 14, 2015

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Muriel Powell
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October 14, 2015

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Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: Bank of America, N.A. v. Shawn L. Bethea, et al.
Case No. 2015-000985

Dear Ms. Kitchings:


Enclosed please find an original and one (7) copies of Respondent's Motion to Compel Appellant to Correct Record on Appeal and Extension of Time to File Final Brief, along with a check in the amount of \$25.00, regarding the above-referenced matter.

Upon receipt, kindly file the original and return the conformed copy to my attention in the postage-paid envelope provided for your convenience.

Please feel free to contact me should you have any questions. Thank you for your assistance.

Sincerely,

MCGUIRE WOODS LLP


Muriel Powell
Paralegal

/MP

Enclosures

c: Shawn L. Bethea, Pro Se (w/encl.)

