

77969

RECEIVED  
NOV 24 2015  
SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2015-001717

Branch Banking and Trust Company, ..... Respondent,

v.

Richard Brady a/k/a Rick Brady; First Community Bank; County of Richland;  
and East Richland County Public Service District, Defendants,

Of whom Richard Brady a/k/a Rick Brady is ..... Appellant.

**MOTION FOR SECOND EXTENSION TO FILE APPELLANT'S  
INITIAL BRIEF AND DESIGNATION**

Counsel for Appellant Brady requests and moves for an extension of thirty (30) days in which to file and serve Appellant's Initial Brief and Designation. This request is made because the Court of Appeals has not responded promptly to Appellant's Motion to Reconsider and to Alter or Amend Ordering Denying Petition for Supersedeas and Request for Hearing, which included a renewal of Appellant's initial request for an extension to run until thirty (30) days after the final resolution of the Petition for Supersedeas<sup>1</sup>.

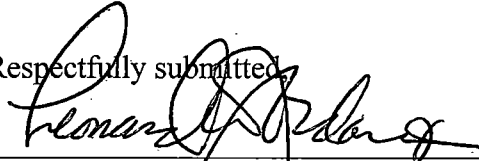
As it is likely that Appellant will conclude that this meritorious appeal will be moot should he be unable to stay the foreclosure sale of his residence, Appellant would not want to incur, in the meantime, the costs of preparing his Brief and the Designation only to have the Supersedeas subsequently denied and his residence sold.

In addition, Richard Brady (Appellant) has been hospitalized three times for a total of 22 days since late-October and is presently in the hospital; and he has been unable to provide

<sup>1</sup> The Court did grant a thirty (30) day extension, which expires on November 30, 2015.

assistance to his counsel with regard to this appeal.

Respectfully submitted,



---

Leonard R. Jordan, Jr., ID #2248

JORDAN LAW FIRM

4500 Fort Jackson Boulevard

Columbia, South Carolina 29209

(803) 726-1950 Tel

(803) 726-1951 Fax

Email: [ljordan@ljordanlaw.com](mailto:ljordan@ljordanlaw.com)

Attorney for Appellant, Richard Brady a/k/a  
Rick Brady

Columbia, South Carolina  
November 24, 2015

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

Appellate Case No. 2015-001717

CERTIFICATE OF MAILING

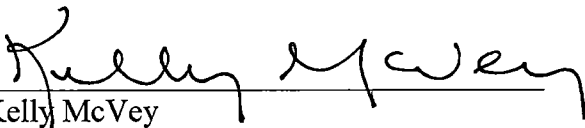
**RECEIVED**  
NOV 24 2015  
SC Court of Appeals

I, Kelly McVey, of Jordan Law Firm, attorney for the Appellant, Richard Brady a/k/a Rick Brady, hereby certify that I have this 24<sup>th</sup> day of November, 2015, served copies of the Motion for Second Extension to File Appellant's Initial Brief and Designation upon Vance L. Brabham, III, Esquire, attorney for the Respondent, Branch Banking and Trust Company, Jeffrey L. Silver, Esquire, attorney for First Community Bank, and Lauren Sutton Hogan, Esquire, attorney for County of Richland, by mailing copies thereof, postage prepaid, to the said counsel at the addresses indicated below:

Vance L. Brabham, III, Esquire  
Attorney at Law  
2712 Middleburg Drive, Suite 200  
Columbia, SC 29204

Jeffrey L. Silver, Esquire  
Attorney at Law  
P.O. Box 11656  
Columbia, SC 29211-1656

Lauren Sutton Hogan, Esquire  
Attorney at Law  
P.O. Box 192  
Columbia, SC 29202

  
\_\_\_\_\_  
Kelly McVey

LEONARD R. JORDAN, JR.  
TELEPHONE: (803) 726-1950  
DIRECT LINE: (803) 255-0650  
EMAIL: LJORDAN@LJORDANLAW.COM

**JORDAN**  
**LAW FIRM**  
LEONARD JORDAN, ATTORNEY, LLC

4500 FORT JACKSON BOULEVARD  
COLUMBIA, SOUTH CAROLINA 29209  
TOLL FREE: (866) 222-1044  
FACSIMILE: (803) 726-1951

November 19, 2015

The Honorable V. Claire Allen  
Deputy Clerk  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211-1629

RE: Branch Banking v. Richard Brady  
Appellate Case No. 2015-001717

Dear Deputy Clerk:

On November 4, 2015, I filed Appellant's **Motion to Reconsider and to Alter or Amend Order Denying Petition for Supersedeas and Request for Hearing**. I would appreciate your treating this Motion on an emergency or priority basis.

The primary purpose of the Motion is to obtain a stay of the foreclosure sale of Appellant's residence, which sale is scheduled for **December 7, 2015**.

The secondary purpose of the Motion is to extend the deadline for filing Appellant's initial Brief and the Designation, which is **November 30, 2015**.

Your prompt attention to this matter will be greatly appreciated.

Thanking you in advance for your cooperation with this matter, I am

Sincerely yours,



Leonard R. Jordan, Jr.

LRJjr/km

cc: Vance L. Brabham, III, Esquire

*As of 11/24/15, 7:30 AM,  
not reflected on SC  
Appellate Case Management  
System.*

**RECEIVED**  
NOV 24 2015  
SC Court of Appeals

LEONARD R. JORDAN, JR.  
TELEPHONE: (803) 726-1950  
DIRECT LINE: (803) 255-0650  
EMAIL: LJORDAN@LJORDANLAW.COM

**JORDAN**  
**LAW FIRM**  
LEONARD JORDAN, ATTORNEY, LLC

4500 FORT JACKSON BOULEVARD  
COLUMBIA, SOUTH CAROLINA 29209  
TOLL FREE: (866) 222-1044  
FACSIMILE: (803) 726-1951

November 24, 2015

The Honorable V. Claire Allen  
Deputy Clerk  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211-1629

RECEIVED  
NOV 24 2015  
SC Court of Appeals

RE: Branch Banking v. Richard Brady  
Appellate Case No. 2015-001717

Dear Deputy Clerk:

Enclosed is a Motion for Second Extension to File Appellant's Initial Brief and Designation along with 7 copies thereof for filing in the above-referenced matter.

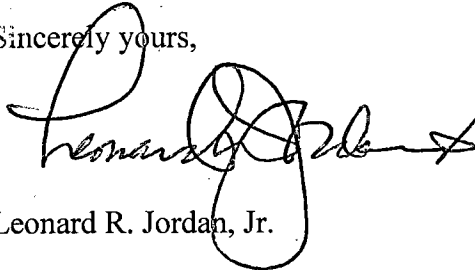
Please file stamp one of these copies and return it to me in the self-addressed, stamped envelope provided herewith.

By copies of this letter, we are serving this Motion for Second Extension to File Appellant's Initial Brief and Designation on all counsel of record.

If you have any questions regarding this matter, please do not hesitate to call.

Thanking you in advance for your cooperation with this matter, I am

Sincerely yours,



Leonard R. Jordan, Jr.

LRJjr/km  
Enclosures

cc: Vance L. Brabham, III, Esquire  
Jeffrey L. Silver, Esquire  
Lauren Sutton Hogan, Esquire