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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM YORK COUNTY
Court of Common Pleas

NOV 23 2015

SC Court of Appeals

S. Jackson Kimball, III, Master In Equity

Case No. 2011-CP-46-04278
Court of Appeals No. 2015-001857

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

v.

Michelle Minardi and Ameris Bank, Defendants,
Of whom Michelle Minardi is the.....Appellant.

**RESPONDENT'S FIRST MOTION FOR AN
EXTENSION OF TIME TO FILE AN INITIAL BRIEF AND
DESIGNATE MATTERS FOR INCLUSION IN THE RECORD ON APPEAL**

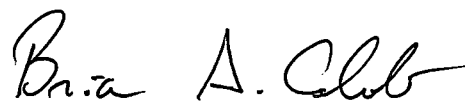
Brian A. Calub
S.C. Bar No. 72009
MCGUIREWOODS LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2009
Fax: (704) 373-8842

Attorney for Respondent

Date: November 11, 2015

Pursuant to Rule 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 (BANA) respectfully requests that the Court issue an order that extends its deadline to file an initial brief and to designate matters for inclusion in the Record for Appeal by twenty-one days. Appellant's counsel consents to BANA's request for an extension. This case was transferred from BANA's trial counsel to the undersigned appellate counsel on October 28, 2015, which was two days after Appellant filed her initial brief on October 26, 2015. Given the long history of the case, which has been pending since 2011, BANA's appellate counsel needs additional time to review the trial court record, identify additional matters to be designated for the record on appeal, and draft an initial brief.

WHEREFORE, for good cause shown and upon the consent of the parties, BANA prays that the Court issue an order that extends BANA's deadline to file an initial brief and designate matters to be included in the record on appeal from November 25, 2015, to December 16, 2015.



Brian A. Calub
S.C. Bar No. 72009
MCGUIREWOODS LLP
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel: (704) 343-2009
Fax: (704) 373-8842

Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that *Respondent's First Motion for Extension of Time to File an Initial Brief and Designate Matters for Inclusion in the Record on Appeal* was served on appellant's counsel by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

J. Cameron Halford
Halford Niemic & Freeman, LLP
238 Rockmont Drive
Fort Mill, SC 29708

This the 11th day of November, 2015.



Brian A. Calub
Brian A. Calub

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SC Court of Appeals

McGuireWoods LLP
Fifth Third Center
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel 704.343.2000
Fax 704.343.2300
www.mcguirewoods.com

Brian A. Calub
Direct: 704.343.2009

McGUIREWOODS

BCalub@mcguirewoods.com
Fax: 704.373.8842

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SC Court of Appeals

November 20, 2015

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

Re: ***Bank of America, N.A. v. Michelle Minardi, et al.***
Court of Appeals No. 2015-001857
Court of Common Pleas No. 2011-CP-46-04278

Dear Ms. Kitchings:


Enclosed please find an original and seven copies of *Respondent Bank of America, N.A.'s First Motion for Extension of Time to file an Initial Brief and Designate Matters for Inclusion in the Record on Appeal* and the required \$25.00 filing fee.

We previously transmitted the motion to your office for filing on November 11, 2015. But we placed the wrong appellate case number and wrong common pleas number on our previously submitted motion. To this end, we are re-submitting the motion for filing with the correct appellate case number of 2015-001857 and correct common pleas case number of 2011-CP-46-04278 in the caption. We apologize for any inconvenience to you and your office.

Upon receipt, kindly file the original and return a 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.

Sincerely,


Brian A. Calub

/BAC

Enclosures

cc: J. Cameron Halford (w/encl.)

ORIGIN ID: QWGA (704) 343-2000
MURIEL POWELL
MCGUIRE WOODS LLP
201 NORTH TRYON ST
SUITE 3000
CHARLOTTE, NC 28202
UNITED STATES US

SHIP DATE: 20NOV15
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TO JENNY ABBOTT KITCHINGS
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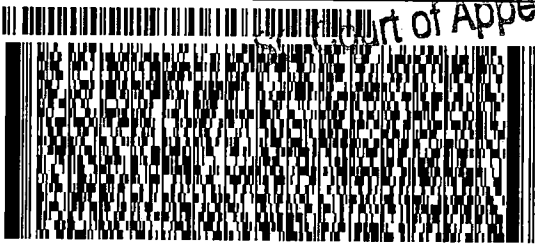
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