

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM DILLON COUNTY  
Court of Common Pleas

Harry Easterling, Jr, Special Referee

RECEIVED  
DEC 02 2015  
SC Court of Appeals

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

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

v.

Shawn L. Bethea, South Carolina Department of Motor Vehicles, Defendants,

Of whom Shawn L. Bethea is the.....Appellant.

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MOTION TO DENY RESPONDENT EXTENSION OF TIME  
TO FILE FINAL BRIEF AND MEMORANDUM IN SUPPORT


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Shawn Bethea, Pro Se  
1317 Gordonville Court  
Dillon, South Carolina 29536  
*Appellant*

Date: December 2, 2015

Pursuant to Rules 210(c) and 263(b) of the South Carolina Appellate Court Rules, Appellant Shawn L. Bethea (Appellant) respectfully requests that the Court deny the request made by Respondent Bank of America, N.A. successor by merger to BAC Home Loans Servicing, LP f/k/a Countrywide Home Loan Servicing LP (Respondent) for Appellant to correct the numbering in his record on appeal “consecutively beginning with the index” as required by Rule 210(c) and to include all the documents listed on the parties’ respective designations of matters to be included in the record on appeal and in the Appellant’s index. At this time, the record on appeal filed by Appellant does comply with the requirements of Rule 210(c) because the record is numbered consecutively beginning with the index. Specifically, the first six pages are numbered in sequence and the document entitled “Manufactured Housing Affidavit” is included in the Appellant’s record. Compliance with Rule 210(c) has been met, and Appellant and Respondent can comply with Rule 211(b)’s reference to record requirement. There is not good cause to grant the 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, Appellant prays that the Court does not 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 not provide 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.



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Shawn Bethea, Pro Se  
1317 Gordonville Court  
Dillon, South Carolina 29536


CERTIFICATE OF SERVICE

The undersigned Motion to Deny was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid address to:

McGuireWoods LLP  
Fifth Third Street  
201 North Tryson Street  
Suite 3000  
Charlotte, NC 28202  
Respondent

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This is the 2nd day of December, 2015

  
Shawn Bethea