

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

DEC 21 2015

The Honorable J.C. Nicholson, Jr., Circuit Court Judge

SC Court of Appeals

Appellate Case No. 2015-001508
Case No. 2013-CP10-6439

Wells Fargo Bank, N.A., Successor by Merger to
Wachovia Bank, National Association Respondent,

v.

Robert L. Freeman Appellant.

**AMENDED CONSENT MOTION FOR EXTENSION OF TIME TO FILE REPLY
BRIEF**

COME NOW Appellant Robert L. Freeman, by and through their undersigned counsel, and hereby requests a fourteen day extension of time to file Appellant's Reply Brief, pursuant to Rule 240 of the South Carolina Rules of Appellate Procedure.

Respondent served their Initial Brief and Designation of Matter on November 13, 2015 which makes Appellant's Reply Brief due on December 21, 2015. Respondent consents to this request. Appellant respectfully request that the deadline to file their Reply Brief be extended to January 4, 2016.



G. Trenholm Walker (SC # 5777)
Katie F. Monoc (SC Bar # 78131)
Pratt-Thomas Walker, P.A.
P.O. Drawer 22247
Charleston, SC 29413-2247
Attorneys for Appellant

December 18, 2015

Other Counsel of Record:

Robert C. Byrd, Esquire
A. Smith Podris, Esquire
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Attorneys for Respondent

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PROOF OF SERVICE

I, Michaela L. Shepherd, of Pratt-Thomas Walker, P.A., hereby certify that I have served a true and accurate copy of the Amended Consent Motion for Extension of Time to File Reply Brief by U.S. Mail postage pre-paid on December 18, 2015 to counsel of record as shown below:

Robert C. Byrd, Esquire
A. Smith Podris, Esquire
Parker Poe Adams & Bernstein, LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
Attorney for Respondent



Michaela L. Shepherd
Paralegal

December 18, 2015
Charleston, South Carolina

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Wells Fargo Bank, N.A. v. Robert L. Freeman
C/A No.: 2013-CP-10-6439

Dear Ms. Kitchings:

Enclosed please find the original and six copies of Appellant Robert L. Freeman's Amended Consent Motion for Extension of Time to File Reply Brief and Proof of Service. Thank you for your courtesies and please let me know if you have any questions.

Sincerely,



Michaela L. Shepherd
Paralegal to Katie F. Monoc

/mls

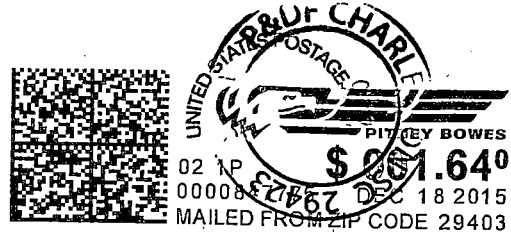
c: Robert C. Byrd, Esquire
A. Smith Podris, Esquire

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