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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JAN 08 2016

SC Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

Appellate Case No. 2015-002049
Civil Action No. 2013-CP-27-00253

Bank of Walterboro,.....Plaintiff/Respondent,

v.

Charles E. Bush aka Charles Bush, Rosemelle M. Shuler, First
Family Financial Services of Georgia, Inc., EquiFirst Corporation,
Mortgage Electronic Registration Systems, Inc. as nominee for BNC
Mortgage Inc., and South Carolina Department of Revenue,.....Defendants,

of whom Mortgage Electronic Registration Services, Inc. is the Appellant,

and

Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

APPELLANT'S SECOND MOTION
FOR ENLARGEMENT OF TIME
TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER

Undersigned counsel for Appellant Mortgage Electronic Registration Systems, Inc. ("MERS") respectfully moves before the Court for a thirty (30) day extension of time in which to file the Initial Brief of Appellant. The Initial Brief of Appellant is currently due January 7, 2016. If the requested enlargement is granted, the new due date would be February 8, 2016. The grounds for this motion are as follows:

1. The parties are currently undergoing settlement negotiations and Appellant would request an extension so as to promote ongoing negotiations in an attempt to resolve this matter in its entirety;

2. No prejudice to any party nor undue delay would result from the extension; and

3. Appellant's counsel therefore believes there is good cause to grant the requested thirty (30) day extension to February 8, 2016.

(SIGNATURE ON FOLLOWING PAGE)

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Respectfully submitted,

FINKEL LAW FIRM LLC



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*Attorney for Defendant Mortgage Electronic
Registration Systems, Inc., as Nominee for
BNC Mortgage, Inc.*

January 5, 2016

Respondents' counsel:

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*Attorney for Respondent
Bank of Walterboro*

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*Attorney for Respondent
Rosemelle M. Shuler*

IN THE STATE OF SOUTH CAROLINA
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of whom Mortgage Electronic Registration Services, Inc. is the Appellant,

and

Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

PROOF OF SERVICE

I hereby certify that, on the 5th day of January, 2016, a copy of the *Appellant's Second Motion for Enlargement of Time to File Initial Brief and Designation of Matter* was served upon the following individual(s) by mailing a copy of the same with sufficient first class postage affixed thereto and addressed as follows:

The Honorable Darrell Thomas Johnson, Jr.
Special Referee, County of Jasper
Law Office of Darrell Thomas Johnson, Jr., LLC
Post Office Box 1125
Hardeeville, South Carolina 29927

George W. Cone, Esq.
McLeod Fraser & Cone LLC
Post Office Box 230
Walterboro, South Carolina 29488
Attorney for Plaintiff

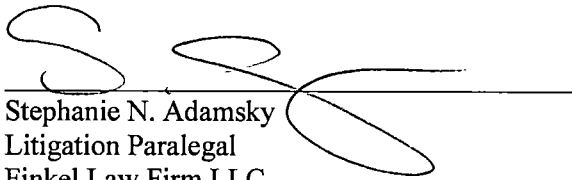
Charles E. Bush
380 Church Street
Hardeeville, South Carolina 29927
Defendant, Pro se

Milton G. Kimpson, Esq.
Office of Gen. Counsel for Tax and Reg. Services
SC Department of Revenue
Post Office Box 12265
Columbia, South Carolina 29211

Equifirst Corporation
c/o CT Corporation System, Registered Agent
150 Fayetteville Street, Box 1011
Raleigh, North Carolina 27601
Defendant

R. Thayer Rivers, Jr., Esq.
Attorney at Law
Post Office Box 668
Ridgeland, South Carolina 29936
Attorney for Defendant Rosemelle M. Shuler

First Family Financial Services, Inc., successor
by merger to First Family Services of Georgia,
c/o CT Corporation System, Registered Agent
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Defendant


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STEPHANIE N. ADAMSKY, PARALEGAL
SADAMSKY@FINKELLLAW.COM

January 5, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

REPLY TO:
CHARLESTON LITIGATION

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SC Court of Appeals

Re: Bank of Walterboro v. Charles E. Bush aka Charles Bush, Rosemelle M. Shuler, First Family Financial services of Georgia, Inc., EquiFirst Corporation, Mortgage Electronic Registration Systems, Inc., as nominee for BNC Mortgage, Inc., and SC Department of Revenue Appellate Case No. 2015-002049 Case No.: 2013-CP-27-00253 Our File No.: 52310.49481

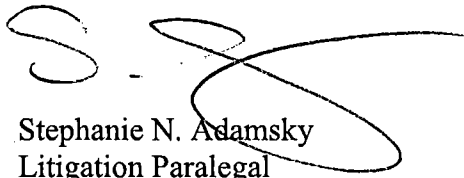
Dear Ms. Kitchings:

Enclosed for filing please find the original and three copies of *Appellant's Second Motion for Enlargement of Time to File Initial Brief and Designation of Matter* along with the related *Proof of Service* in the above referenced matter. We respectfully request that you please file same and return the file-stamped copies to our office in the enclosed envelope.

Also enclosed is check #5796 in the amount of \$25.00 for the filing fee.

If anything further is required or if you have any questions, please do not hesitate to contact our office.

Yours very truly,



Stephanie N. Adamsky
Litigation Paralegal

/sna

cc: The Honorable Darrell Thomas Johnson, Jr.
George W. Cone, Esq.
R. Thayer Rivers, Jr., Esq.
Charles E. Bush, *Pro Se*
First Family Financial Services, Inc.
EquiFirst Corporation
Milton G. Kimpson, Esq.

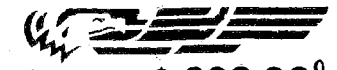
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The Honorable Jenny Abbott Kitchings
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