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STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

RECEIVED

JAN 19 2016

The Honorable Joe M. Crosby, Master-in-Equity

SC Court of Appeals

APPELLATE CASE NO. 2015-002484

TD Bank, N.A., Successor by merger to  
Carolina First Bank, N.A., .....Respondent,

vs.

Sunil V. Lalla and Sharon W. Lalla, .....Appellants.

**MOTION TO EXTEND TIME TO FILE APPELLANTS' INITIAL BRIEF AND  
DESIGNATION OF MATTER**

The Appellants respectfully move before this Court for an extension of time to file and serve their Initial Appellants' Brief and Designation of Matter to be Included in the Record on Appeal and for an extension of time to file those pleadings out of the time limits prescribed by Rule 208 of the South Carolina Rules of Appellate Procedure.

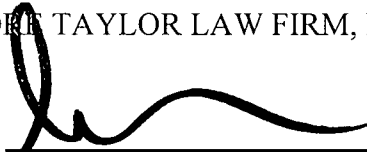
The Appellants' motion is based on the grounds that prior work commitments and deadlines, coupled with the office closure for the Holidays, resulted in confusion as to the applicable deadlines, giving rise to an inadvertent delay in preparing and filing Appellants' Initial Brief.

THEREFORE, the Appellants respectfully request and move that they be granted an extension of time to prepare, file and serve their Initial Brief and Designation of

Matter to be included in the Record on Appeal and to be allowed to file their Initial Brief and Designation of Matter to be included in the Record on Appeal out of the time limits prescribed by Rule 208 of the South Carolina Rules of Appellate Procedure.

MOORE TAYLOR LAW FIRM, PA

BY:



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S. Jahue Moore,  
Post Office Box 5709  
West Columbia, South Carolina 29171  
(803) 796-9160  
Attorney for Appellants

West Columbia, South Carolina

January 19, 2016

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

The Honorable Joe M. Crosby, Master-in-Equity

RECEIVED  
JAN 19 2016  
SC Court of Appeals

APPELLATE CASE NO. 2015-002484

TD Bank, N.A., Successor by merger to  
Carolina First Bank, N.A., ..... Respondent,

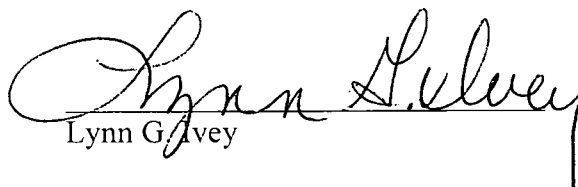
vs.

Sunil V. Lalla and Sharon W. Lalla, ..... Appellants.

**PROOF OF SERVICE**

I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A. certify that I have served the Appellants' Motion to Extend Time to File Appellants' Initial Brief and Designation of by mail on January 19, 2016, by way of US Mail, with sufficient prepaid postage, to the counsel of record addressed as follows:

Tara C. Sullivan, Esquire  
Nelson Mullins, LLP  
1320 Main Street, 17<sup>th</sup> Floor  
Columbia, SC 29201

  
Lynn G. Ivey

West Columbia, South Carolina

January 19, 2016

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**JAN 19 2016**

**SC Court of Appeals**

January 19, 2016

S. Jahue Moore†  
J. Mark Taylor\*  
C. Vance Stricklin, Jr.  
James Edward Bradley†  
Sheila McNair Robinson  
Christian G. Spradley  
C. David Sawyer, Jr.  
William H. Edwards  
Stanley L. Myers  
Jane H. Downey\*  
S. Jahue Moore, Jr.  
John C. Bradley, Jr.  
Melissa K. Moore  
William B. Fortino  
Ralph Nichols Riley, Jr.  
Amber Cary Fulmer  
Sarah Taylor Cassidy  
Gregory R. Close  
-----  
Robert D. Hazel  
OF COUNSEL  
Billy C. Coleman  
RETIRED

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

RE: TD Bank vs. Sunil V. Lalla and Sharon W. Lalla  
C.A. No.: 2015-002484

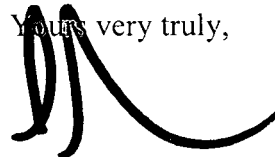
Dear Ms. Kitchings:

You will please find enclosed the original and seven (7) copy of the Appellant's Motion to be Allowed to file their Initial Brief and Designation of Matter to be Included in the Record on Appeal outside of the time limits prescribed by Rule 208 of the South Carolina Rules of Appellate Procedure and also for an Extension of Time to file said Brief and Designation. Also enclosed is our check in the amount of \$25.00 for the filing fee. I would appreciate your filing the original in your office and return the filed copies to me via my courier. Under cover of this letter, I am serving opposing counsel with a copy of this motion.

Your letter of January 6, 2016 references a Transcript. As previously noted by the Respondent, there was no Transcript of Record made of the Lower Court's September 14, 2015 hearing.

Thank you for your assistance in this matter.

Yours very truly,



S. Jahue Moore

SJM:dc  
Enclosures  
cc w/encl.: Tara C. Sullivan, Esquire