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THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Hon. S. Jackson Kimball III  
Master in Equity

**RECEIVED**  
JAN 21 2016  
SC Court of Appeals

Case no. 2011-CP-46-250

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

vs.

Michelle Minardi and Ameris Bank,  
of whom Defendant Michelle Minardi is the .....APPELLANT

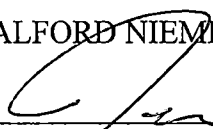
APPELLANT MOTION FOR EXTENSION  
TO RESPOND TO RESPONDENT MOTION TO STRIKE  
AND MOTION FOR SCHEDULING

Counsel for Appellant hereby respectfully moves the court for an extension of  
time for Appellant to file Appellant's Reply to the Motion to Strike filed by Respondent  
on January 6, 2016. Appellant Counsel has communicated with opposing counsel  
regarding a ten (10) day continuance, who indicates no objection. Appellant prays that  
the Court of Appeals enter an Order granting Appellant extension through the date of  
January 24, 2016.

Counsel further moves that the court assign amended deadlines for publishing the Record  
of Appeal pending outcome and disposition of the Motion to Strike referenced above.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP

  
\_\_\_\_\_  
J. Cameron Halford  
S.C. Bar 17184  
238 Rockmont Drive  
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cam@fortmilllaw.com  
Attorney for Appellant Michelle Minardi

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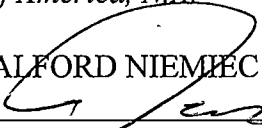
PROOF OF SERVICE

**SC Court of Appeals**

I hereby certify that I am the attorney for the Appellant Michelle Minardi in the above captioned case and that I did on January 18, 2016 serve a copy of the foregoing APPELLANT MOTION TO EXTEND DEADLINE TO SERVE APPELLANTS' REPLY TO RESPONDENT MOTION TO STRIKE on counsel for the counsel identified below, by e-mail delivery and U.S. mail, postage prepaid, and addressed as follows:

Brian A. Calub, Esq.  
McGuire Woods, L.L.P.  
201 N. Tryon Street,  
Charlotte, North Carolina 28202  
*Attorneys for Bank of America, N.A.*

HALFORD NIEMIEC & FREEMAN, LLP

  
\_\_\_\_\_  
J. Cameron Halford  
S.C. Bar No. 17184  
238 Rockmont Drive  
Fort Mill, S.C. 29708

LAW OFFICES

**HALFORD, NIEMIEC & FREEMAN, L.L.P.**  
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J. Cameron Halford ^  
Matthew R. Niemiec  
P. John Freeman

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matt@fortmilllaw.com  
jfreeman@fortmilllaw.com

January 18, 2016

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

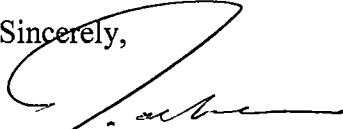
Re: Bank of America, N.A., as successor by merger to BAC Home Loans  
Servicing, LP, f/k/a Countrywide Home Loans Servicing, LP f/k/a  
Countrywide Home Loans Servicing, LP vs. Michelle Minardi and  
Ameris Bank  
Case No.: 2011-CP-46-250

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of the Appellant's Motion for Extension to Respond to Respondent's Motion to Strike and Motion for Scheduling and Proof of Service regarding the above-referenced matter. In this regard, I would appreciate your filing these documents and returning a clocked copy to my office in the envelope provided. I have also enclosed my check in the amount of \$25.00 for the cost of filing. If you have any questions regarding the enclosed or this matter, please do not hesitate to contact my office.

With kind personal regards, I am

Sincerely,

  
J. Cameron Halford

JCH:tml

Enclosures

cc: Ms. Michelle Minardi  
w/enclosure  
Brian Calub, Esquire  
w/enclosure

^ MEDIATOR AND ARBITRATOR

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