

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

O. Davie Burgdorf, Master-in-Equity

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Case No. 2007-CP-38-807

**MOTION FOR EXTENSION**

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Deutsche Bank National Trust Company as Trustee  
for the Holders of New Century Home Equity Loan  
Trust, Series 2005-A, Asset Backed Pass-Through  
Certificates, ..... Respondent,

v.

Laura Toney, LaSalle Bank National Association, as  
Trustee for the registered holders of Structured Asset  
Securities Corporation, Structured Asset  
Investment Loan Trust, Mortgage Pass-  
Through Certificates, Series 2004-11 and LaSalle Bank  
National Association, Trustee for Lehman Brothers  
Structured Asset Investment Loan Trust Sail 2005-2  
of whom  
Laura Toney is, ..... Appellant.

Laura Toney  
P.O. Box 722  
Bishopville, SC 29010  
(803) 459-6006  
pro se Appellant

H. Guyton Murrell  
P.O. Box 11264  
Columbia, SC 29211  
(803) 252-5817  
Attorney for Respondent

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SC Court of Appeals

The respondent would respectfully move pursuant to Rule 240(a) of the South Carolina Appellate Court Rules for an order granting respondent an extension of time to file its initial brief and designation of matter on the following grounds:

1. Pursuant to Rule 208(a)(2) and Rule 209(a) SCACR, respondent shall serve and file its initial brief and designation of matter within thirty (30) days after service of appellant's initial brief.

2. Respondent's counsel has had an unusually large number of court appearances during the past two (2) months requiring counsel's appearance throughout various circuit courts throughout the state.

3. Respondent's counsel also has another pending appeal in which a motion was just received and which required a prompt and detailed response.

4. During the pendency of this appeal, appellant has also filed an action in federal court which required the involvement and participation of respondent's counsel.

5. Appellant has repeatedly made allegations against respondent's counsel in this appeal, related actions and repeated grievances which require a very considered and thoughtful response in the respondent's brief.

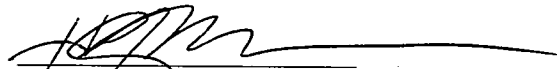
6. This appeal has a voluminous record from the many federal bankruptcy cases, state court actions and various hearings related to this matter.

7. Respondent hereby moves for an order granting respondent a thirty (30) day extension of time in which to file and serve its initial brief and designation of matter.

For the reasons stated, respondent would request that Court grant respondent's motion for an extension of time to file and serve its initial brief and designation of matter.

May 11, 2012

Respectfully submitted,



H. Guyton Murrell  
P.O. Box 11264  
Columbia, SC 29211  
(803) 252-5817  
Attorney for Respondent

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O. Davie Burgdorf, Master-in-Equity

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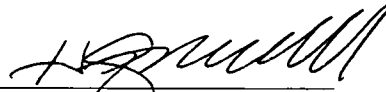
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**SC Court of Appeals**

I certify that I have served the Motion for Extension of Time on Laura Toney by depositing a copy of it in the United States Mail, postage prepaid, on May 11, 2012, addressed to the pro se Appellant, Laura Toney, P.O. Box 722, Bishopville, SC 29010.



H. Guyton Murrell  
P.O. Box 11264  
Columbia, SC 29211  
(803) 252-5817  
Attorney for Respondent

64187

**KORN LAW FIRM, P. A.  
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1300 PICKENS STREET  
COLUMBIA, SOUTH CAROLINA 29211  
(803) 252-5817**

May 11, 2012

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

Re: Deutsche Bank v. Laura Toney, et al  
Case No. 2007-CP-38-807  
File No. F27-02370

Dear Sir or Madam:

Enclosed please find the original and six (6) copies of Respondent's Motion for Extension with Proof of Service and the requisite \$25.00 filing fee in the above noted matter. By copy of this correspondence of this letter, I am also serving the Appellant with the motion.

Your attention in this matter is very much appreciated.

Very truly yours,



H. Guyton Murrell

cc:  
Laura Toney  
P.O. Box 722  
Bishopville, SC 29010

Elizabeth Polk, Esquire  
P.O. Box 2065  
Columbia, SC 29202

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