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MAR 14 2016

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the 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 Registrations Systems, Inc., is the Appellant,

And

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


**RESPONDENT BANK OF WALTERBORO'S  
MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF**

Undersigned counsel for Respondent Bank of Walterboro respectfully moves before the Court for a Forty-five (45) day extension of time in which to file the Initial Brief of Respondent. The Initial Brief of Respondent is currently due March 14, 2016. If the requested enlargement is granted, the new due date would be April 28, 2016. This motion is based on the grounds that I am working in conjunction with Thayer Rivers, attorney for Respondent Shuler, to prepare my Initial Brief, and that due to his recent schedule and my recent heavy schedule, I have been unable to communicate and/or meet with Attorney Rivers to discuss this matter with him, and to finish my legal research and prepare my finished brief.

Bank of Walterboro v. Charles E. Bush, et al.  
Appellate Case No. 2015-002049  
RESPONDENT'S MOTION FOR ENLARGEMENT OF TIME  
TO FILE RESPONDENT BANK OF WALTERBORO'S INITIAL BRIEF  
Page 2 of 2

March 10, 2016.

McLeod Fraser & Cone, LLC

  
GEORGE W. CONE, ESQUIRE  
Post Office Box 230  
Walterboro, South Carolina 29488  
843-549-2516

Other Counsel of Record:

Sean A. O'Connor, Esquire  
Finkel Law Firm, LLC  
4000 Faber Place Drive, Suite 400  
North Charleston, SC 29405  
Attorney for the Appellant

R. Thayer Rivers, Jr., Esquire  
Law Office of R. Thayer Rivers, Jr.  
Post Office Box 668  
Ridgeland, SC 29936  
Attorney for Respondent, Rosemelle M. Shuler

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Electronic Registration Systems, Inc., as nominee for BNC Mortgage Inc.,  
And South Carolina Department of Revenue ..... Defendants,

Of Whom Mortgage Electronic Registrations Systems, Inc., is the Appellant,

And

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

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**PROOF OF SERVICE**

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I certify that I have served the Respondent Bank of Walterboro's Motion for Extension of Time to File Initial Brief on the Appellant by depositing a copy of same in the United States Mail, postage prepaid, on March 10, 2016 addressed to its attorney of record, Sean A. O'Connor, Finkel Law Firm, LLC, 4000 Faber Place Drive, Suite 400, North Charleston, SC, 29405, and to the Respondent, Rosemelle M. Shuler, by depositing a copy of same in the United States Mail, postage prepaid, on March 10, 2016 addressed to its attorney of record R. Thayer Rivers, Jr., Post Office Box 668, Ridgeland, SC, 29936.

March 10, 2016.

Bank of Walterboro v. Charles E. Bush, et al.  
Appellate Case No. 2015-002049  
PROOF OF SERVICE  
Page 2 of 2

McLeod Fraser & Cone, LLC



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**MCLEOD FRASER & CONE LLC**  
ATTORNEYS AT LAW

W.J. MCLEOD, JR.  
(1906-1994)  
DONALD H. FRASER  
(RETIRED)  
PEDEN B. MCLEOD  
GEORGE W. CONE  
J. REAVES MCLEOD  
ANDREW C. MATTHEWS

March 10, 2016

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

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SC Court of Appeals

RE: Bank of Walterboro v. Charles Bush, et al  
Appellate Case No. 2015-002049  
MFC File #34756

Dear Honorable Kitchings,

Enclosed you will find the following:

1. Respondent Bank of Walterboro's Motion For Extension Of Time To file Initial Brief;
2. Proof of Service;
3. Seven copies of the Motion;
4. Our firm's check in the amount of \$25.00 for the filing fee; and
5. Self-addressed stamped return envelope.

I would appreciate it if you would return a clocked copy of the Motion to my office in the self-addressed stamped envelope provided.

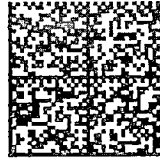
Thank you in advance for your help and consideration.

Very truly yours,

MCLEOD FRASER & CONE LLC

George W. Cone

GWC:lcj  
Enclosures



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MCLEOD FRASER & CONE LLC  
Attorneys at Law  
P.O. Box 230  
Walterboro, S.C. 29488

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SC Court of Appeals

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