

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 14 2016

SC Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

78956

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 ROSEMELLE M. SHULER'S
MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF**

The Respondent Shuler hereby moves for a thirty (30) day extension of time to file her Initial Brief. This motion is based on the grounds that I, attorney for Respondent Shuler, has been involved in another matter that has required my presence a numerous depositions as well as mediation. Accordingly I am in need of additional time to review the records and prepare the Initial Brief of the Respondent Shuler.

March 10, 2016.

Law Office of R. Thayer Rivers, Jr.



R. THAYER RIVERS, JR.

Post Office Box 668

Ridgeland, South Carolina 29936

(843) 726-8136

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

George W. Cone, Esquire
McLeod Fraser & Cone, LLC
Post Office Box 230
Walterboro, SC 29488
Attorney for Respondent, Bank of Walterboro

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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.

PROOF OF SERVICE

I certify that I have served the Respondent Rosemelle M. Shuler'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, Bank of Walterboro, by depositing a copy of same in the United States Mail, postage prepaid, on March 10, 2016 addressed to its attorney of record George W. Cone, Post Office Box 230, Walterboro, SC, 29488.

March 10, 2016.

Law Office of R. Thayer Rivers, Jr.

A handwritten signature in black ink, appearing to read "R. Thayer Rivers, Jr.", written over a horizontal line.

R. THAYER RIVERS, JR.

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Ridgeland, South Carolina 29936

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LAW OFFICE
R. THAYER RIVERS, JR.
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R. THAYER RIVERS, JR.
ALSO ADMITTED IN GEORGIA

TELEPHONE
(843) 726-8136
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(843) 726-4401

March 10, 2016

Sean A. O'Connor, Esquire
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4000 Faber Place Drive, Suite 400
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George W. Cone, Esquire
McLeod Fraser & Cone, LLC
Post Office Box 230
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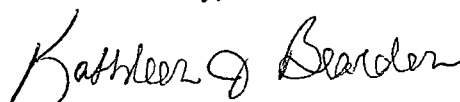
**RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPEAL – 2015-002049**

Gentlemen:

Enclosed herewith please find the Respondent Shuler's Motion for Extension of Time to File Initial Brief in the above matter.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure

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March 10, 2016

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

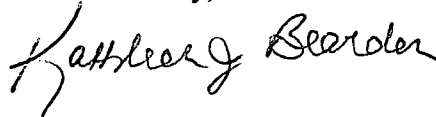
RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPELLATE CASE NUMBER – 2015-002049

Dear Ms. Kitchings:

Enclosed herewith please find the original and seven (7) copies of the Respondent Shuler's Motion for Extension of Time to File Initial Brief in the above matter together with our filing fee. Please file the original and return a clocked copy in the envelope provided.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure



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