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MAR 17 2016
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lee County
R. Ferrell Cothran, Jr., Circuit Court Judge

United States of America, acting through the
Farmers Home Administration, United States
Department of Agriculture,

Respondent,

v.

Maxie Lee Thomas, Jr. a/k/a Maxie Lee Thomas,
deceased, and all other heirs at law and/or distributes
of Maxie Lee Thomas, Jr. a/k/a Maxie Lee Thomas,
deceased, his heirs, personal representatives,
executors, administrators, successors and assigns,
and any spouses if any he has, and all persons entitled
to claim under or through him or any of them; all
persons unknown claiming any right, title, estate,
interest in or lien upon the real estate described in the
Complaint herein, any and all persons who may be in
the military service of the United States of America,
being a class designated as John Doe; and any
unknown minors or persons under a disability being
a class designated as Richard Roe, Laura Ann Toney,
and Brittany Nicole Thomas,

Defendants,

Of whom Laura Ann Toney is the Appellant.

Appellate Case No. 2015-002380

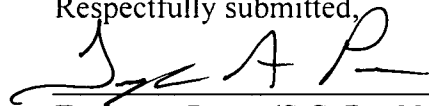
MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER

The Initial Brief of Respondent and Designation of Matter in the above case are due to be served and filed with the Court in the above-referenced matter on April 6, 2016, pursuant to the Court's letter to Appellant dated February 24, 2016 and Appellant's response thereto. However,

due to other pending deadlines and commitments, the undersigned counsel respectfully requests a thirty-day extension, until **May 7, 2016**, in which to file the initial brief of respondent and designation of matter in this action. The Court has granted no previous extensions to the Respondent.

Counsel for Respondent also respectfully requests that the time limits for filing the initial brief of respondent and designation of matter be held in abeyance pending a ruling on this motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'T. A. P.', written over a horizontal line.

Taylor A. Peace (S.C. Bar No. 100206)
TYLER, JACKSON, PEACE
& SILVER, LLC
P.O. Box 11656
Columbia, South Carolina 29211-1656
(803) 779-4997

*Attorneys for Respondent, United States of
America, acting through the Farmers Home
Administration, United States Department
of Agriculture*

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Lee County
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to claim under or through him or any of them; all
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unknown minors or persons under a disability being
a class designated as Richard Roe, Laura Ann Toney,
and Brittany Nicole Thomas,

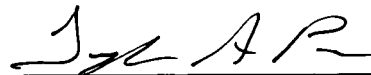
Defendants,

Of whom Laura Ann Toney is the Appellant.

Appellate Case No. 2015-002380

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true copy of the Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter in the above referenced case has been served upon Laura Ann Toney, *pro se* Appellant, at Post Office Box 722, Bishopville, South Carolina 29010, on this 17th day of March, 2016.



Taylor A. Peace (S.C. Bar No. 100206)

TYLER, JACKSON, PEACE
& SILVER, LLC
P.O. Box 11656
Columbia, South Carolina 29211-1656
(803) 779-4997

*Attorneys for Respondent, United States of
America, acting through the Farmers Home
Administration, United States Department
of Agriculture*

SUBSCRIBED AND SWORN TO

before me this 17th day of March, 2016.

Ghonda Demise Jayworth

Notary Public for South Carolina

My Commission Expires: October 17, 2021

TYLER, JACKSON, PEACE & SILVER, LLC

ATTORNEYS AND COUNSELORS AT LAW

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March 17, 2016

VIA HAND DELIVERY

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

RECEIVED

MAR 17 2016

SC COURT OF APPEALS

RE: United States of America, acting through the Farmers Home Administration,
United States Department of Agriculture v. Maxie Lee Thomas, Jr., et al.

Of Whom Laura Ann Toney is the Appellant.

Appellate Case No.: 2015-002380

Our File No.: 2518.23031/DWT

Dear Ms. Kitchings:

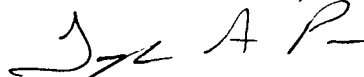
Our law firm represents the Respondent, United States of America, acting through the Farmers Home Administration (United States Department of Agriculture), in the above referenced matter. Enclosed please find an original and seven (7) copies of our Motion for Extension of Time to File Initial Brief of Respondent and Designation of Matter. Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Please file the original and return a clocked copy to me in the self-addressed envelope provided.

By copy of this letter, I am serving Laura Ann Toney, *pro se* Appellant, with a copy of the same.

Thank you for your assistance with this matter.

Sincerely,

TYLER, JACKSON,
PEACE & SILVER, LLC



Taylor A. Peace, Esquire

TAP/rdf
Enclosures

cc: Laura Ann Toney, *pro se* Appellant