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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM Horry County Circuit Court
Cynthia Graham Howe, Master-In-Equity

MAR 24 2016

SC Court of Appeals

Case No.: 2010-CP-26-11806

Ventures Trust 2013-I-H-R by MCM Capital Partners, LLC, its trustee.....Respondent,

v.

Nancy Hardwick; Bank of America, N.A.; Caropines Community Association.....Defendants,

Of whom Nancy Hardwick is the.....Appellant.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT

Respondent, Ventures Trust 2013-I-H-R by MCM Capital Partners, LLC, its trustee, through undersigned counsel, moves under Rule 263 of the South Carolina Appellate Court Rules to hold the appeal in abeyance, and as grounds therefore states as follows:

The Appellant has an open and ongoing Bankruptcy case in the United States Bankruptcy Court for the District of South Carolina, C/A No: 15-06494-jw. There was an Order issued in the Bankruptcy case on March 4, 2016 requiring Loss mitigation/mortgage modification. This Order requires the Mortgage Creditor (BSI Financial Services) to participate in the Loss mitigation/mortgage modification portal program through the Bankruptcy Court. The outcome of this participation in the loss mitigation/mortgage modification portal program will directly affect the underlying action that is being appealed. If Appellant and mortgage creditor successfully enter into a loss mitigation/mortgage modification, the Order that is the subject of this appeal would be vacated and dismissed. Vacating and dismissing the underlying action would render the appeal

moot and therefore the Respondent requests that the Court hold the appeal in abeyance pending the outcome of the loss mitigation review, as ordered by the District Court.

WHEREFORE, Respondent, Ventures Trust 2013-I-H-R by MCM Capital Partners, LLC, its trustee, respectfully requests that this Court hold the appeal in abeyance pending the outcome of the loss mitigation review as ordered by the District Court.



Caroline Glenn, (SCSB #77157)
Brock & Scott, PLLC
3800 Fernandina Road, Suite 110
Columbia, South Carolina 29210
Attorney for Respondent

Dated: 24 day of March, 2016

CERTIFICATE OF SERVICE

The undersigned **MOTION TO HOLD APPEAL IN ABEYANCE** was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid, addressed to:

Nancy C. Hardwick
34 Pine Valley Lane
Surfside Beach, SC 29575
Appellant

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This the 24 day of March, 2016.

Caroline Glenn
Caroline Glenn, (SCSB #77157)