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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

APR 14 2016
SC Court of Appeals

The Honorable R. Markley Dennis, Jr.
Circuit Court Judge

Case No. 2013-CP-10-05329
Appellate Case No. 2016-000028

JPMorgan Chase Bank, National Association,

Appellant,

v.

Delilah Starr Acheson a/k/a Delilah Starr Acheson a/k/a
Starr D. Acheson, individually, as Legal Heir and
Personal Representative of the Estate of Joseph L.
Acheson a/k/a/ Joseph Lynn Acheson, Sr., Deceased,
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,
Jacob Lee Acheson and Daniel Alexander Acheson, as
Legal Heirs or Devisees of the Estate of Joseph L.
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,
Ronald Lee Dowell, Ruth C. Dowell, and Charleston
County Revenue Collections,

Defendants,

Of whom Delilah Starr Acheson a/k/a Delilah S
Acheson a/k/a Starr D. Acheson, individually, and
as Legal Heir and Personal Representative of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Jr., Jacob Lee Acheson, and Daniel
Alexander Acheson, as Legal Heirs or Devisees of the
Estate of Joseph L. Acheson a/k/a Joseph Lynn
Acheson, Sr., Deceased, Ronald Lee Dowell, and
Ruth C. Dowell, are

Respondents.

**RESPONDENTS' MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Please take notice that the Respondents hereby request a 30-day extension of time to file their Initial Brief and Designation of Matter. Additional time is necessary due to ongoing case load demands. This is the Respondent's first request for an extension and counsel for the Appellant has been consulted and has no objection to this request. With the requested extension, Respondent's Initial Brief and Designation of Matter would be due May 17, 2016.

Respectfully submitted,



Sr

Alice F. Paylor, Esquire (#4917)
Rosen, Rosen & Hagood, LLC
P.O. Box 893 (29402)
151 Meeting Street, Suite 400
Charleston, South Carolina 29401
(843) 577-6726

Attorneys for Respondents

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The Honorable R. Markley Dennis, Jr.
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PROOF OF SERVICE

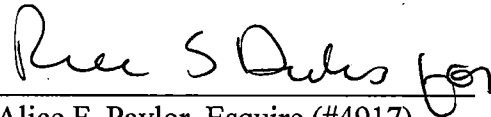
I do hereby certify that I have served all counsel of record in this action with a copy of the documents herein below specified by mailing a copy of the same by United States mail, postage prepaid, to the following addresses on **March 11, 2016**:

Documents: Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter

Counsel Served:

Michael J. Anzelmø, Esquire
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Alice F. Paylor", written over a horizontal line.

Alice F. Paylor, Esquire (#4917)
Rosen, Rosen & Hagood, LLC
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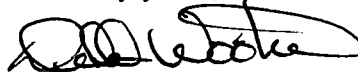
The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
PO Box 116229
Columbia, SC 29201

Re: JP Morgan Chase Bank, N.A. v. Delilah Starr Acheson
Case No. 2013-CP-05329
Appellate Case No. 2016-000028

Dear Ms. Kitchings:

Enclosed herewith please find an original and one copy of Respondents' Motion for Extension of Time to File Initial Brief and Designation of Matter, filing fee check and Proof of Service of same. If you would be so kind, please return a filed copy of the aforementioned Motion in the enclosed self-addressed, pre-posted envelope.

Sincerely yours,



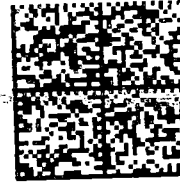
Deborah Wooten, Legal Assistant to
Alice F. Paylor

AFP/dlw
Enclosures
Cc: Michael J. Anzelmo, Esquire (w/encl)

9555.000

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Charleston, South Carolina 29401



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