

19353

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APR 22 2016

SC Court of Appeals

APPEAL FROM DARLINGTON COUNTY

Special Referee

Martin S. Driggers, Sr., Special Referee, Darlington County

Appellate Case No.: 2015-002194

Ashton C. Bull, Appellant

v.

Ashton C. Bull, Linda Bull, Park Avenue Homes, South Carolina Department of Motor Vehicles, Defendants, of whom Vanderbilt Mortgage and Finance, Inc. is Respondent

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

PLEASE TAKE NOTICE that the Respondent, Vanderbilt Mortgage and Finance, Inc., by and through its undersigned counsel, moves for a thirty (30) day extension of time within which to file their initial brief and designation of matter. Respondent's initial brief is currently due April 27, 2016.

For these reasons, the undersigned moves for an extension of time pursuant to Rule 263(a), SCACR. The grounds for the Respondent's request are due to numerous schedule conflicts and deadlines that have not allowed counsel adequate preparation time to complete these matters. The undersigned attorney for the Respondent hereby certifies that he has contacted counsel for Appellant Marcus Woodson who has indicated that he consents to Respondent's request.

Counsel for the Representation therefore requests the Initial Brief and Designation of Matter be due for service on May 27, 2016.

Respectfully submitted,

Crawford & von Keller, LLC

BY: 

Theodore von Keller

B. Lindsay Crawford, III

Sara C. Hutchins

Jonathan M. Riddle

Attorneys for Respondent

April 22, 2016
Columbia, South Carolina

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Ashton C. Bull, Appellant

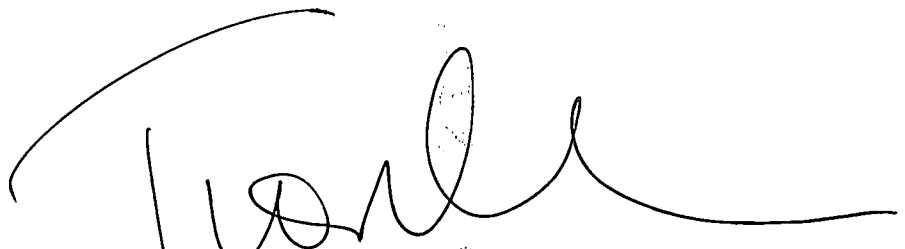
v.

Ashton C. Bull, Linda Bull, Park Avenue Homes, South Carolina Department of Motor Vehicles, Defendants, of whom Vanderbilt Mortgage and Finance, Inc. is Respondent

PROOF OF SERVICE

I certify that I have served the Respondent's Motion for an Extension of Time to File Respondent's Initial Brief and Designation of Matter by depositing a copy of it in the United States Mail, postage prepaid, on April 22, 2016, addressed to its appellant at the following address:

Marcus LeFond Woodson
P.O. Box 1657
Marion, SC 29571



Theodore von Keller



CRAWFORD & VON KELLER, LLC

April 22, 2016

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11626
Columbia, SC 29211

**RE: Vanderbilt Mortgage and Finance, Inc. v. Ashton C. Bull, et al.
Appellate Case no.: 2015-002194**

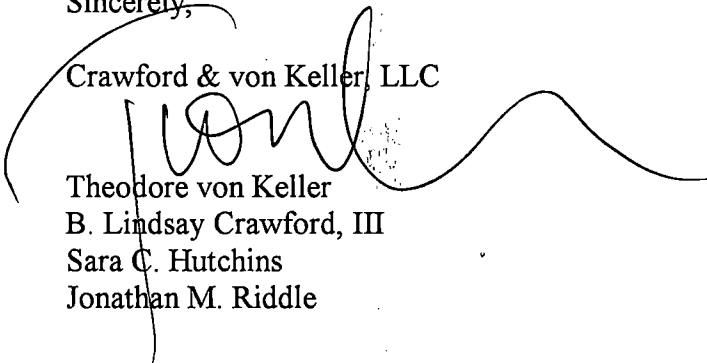
Dear Ms. Kitchings:

Enclosed please find Respondent's Motion for Extension of Time to File Initial Brief regarding the above-referenced appeal, along with our check for the \$25.00 filing fee. This is the Respondent's first request for an extension.

I have contacted counsel for the Appellant, Marcus Woodson, who has consented to our request.

Sincerely,

Crawford & von Keller, LLC


Theodore von Keller
B. Lindsay Crawford, III
Sara C. Hutchins
Jonathan M. Riddle

/prt

cc: Marcus Woodson, Esquire
Chassidy Galyon (via email)

Crawford & von Keller LLC
PO Box 4216
Columbia SC 29240

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The Honorable Jenny Abbott Kitchings
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