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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM JASPER COUNTY  
Special Referee  
The Honorable Darrell Thomas Johnson, Jr.

RECEIVED

APR 25 2016

SC Court of Appeals

Case No. 2015-002049

Bank of Walterboro, ..... Plaintiff,

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 which Mortgage Electronic Registration Systems, Inc., As nominee for BNC Mortgage, Inc., is the .....Appellant,

and

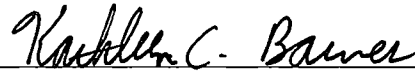
Bank of Walterboro and Rosemelle M. Shuler are the.....Respondents.

RESPONDENT BANK OF WALTERBORO'S MOTION FOR AN EXTENSION

Respondent Bank of Walterboro ("Respondent") moves this Court for a thirty-day extension in which to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. The Initial Brief of Respondent is currently due on Monday, April 25, 2016. The extension is needed because Kathleen C. Barnes, esquire, was recently retained as co-counsel for Respondent and needs time to review the file and prepare an Initial Brief. This is Respondent's second request for an extension but the first request of Kathleen C. Barnes. Respondent respectfully requests an extension of thirty days, making the Initial Brief and Designation of Matter due on Wednesday, May 25, 2016.

April 21, 2016

Respectfully submitted,



Kathleen Chewning Barnes, SC Bar No. 78854

Barnes Law Firm, LLC

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Attorneys for Respondent Bank of Walterboro

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v.

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Of which Mortgage Electronic Registration Systems, Inc., As nominee for BNC Mortgage, Inc., is the .....Appellant,

and

Bank of Walterboro and Rosemelle M. Shuler are the.....Respondents.

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing *Respondent Bank of Walterboro's Motion for an Extension and Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent Bank of Walterboro* have been served upon the following counsel of record by mailing one copy by United States Mail, addressed as shown below this 21<sup>st</sup> day of April, 2016.

Sean A. O'Connor  
Finkel Law Firm, LLC  
4000 Faber Place Drive, Suite 400  
North Charleston, SC 29405

R. Thayer Rivers, Jr.  
Law Office of R. Thayer Rivers, Jr.  
Post Office Box 668  
Ridgeland, SC 29936

Attorney for Appellant

Attorney for Respondent Rosemelle M. Shuler

April 21, 2016

*Kathleen C. Barnes*  
Kathleen Chewning Barnes, SC Bar No. 78854  
Barnes Law Firm, LLC  
P.O. Box 897  
803-943-4529  
Hampton, SC 29924  
kbarnes@barneslawfirm.com

# BARNES

LAW FIRM | LLC

Kathleen C. Barnes

Admitted: Georgia | South Carolina

April 21, 2016

**Via U.S. Mail**

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

**RECEIVED**

APR 25 2016

SC Court of Appeals

Re: *Bank of Walterboro v. Charles Bush, et al.*  
Appellate Case No. 2015-002049

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of Respondent Bank of Walterboro's Motion for an Extension and an original and one copy of a Notice of Appearance of Kathleen C. Barnes on Behalf of Respondent Bank of Walterboro. Also enclosed is proof of service of the Notice and Motion, and a check in the amount of \$25.00 for the Motion filing fee.

Please file the documents and return one file-stamped copy to me in the enclosed self-addressed, stamped envelope. By copy of this letter, I am serving all counsel of record with a copy of the same.

If you have any questions, please do not hesitate to contact me. Thank you.

With kind regards, I am,

BARNES LAW FIRM, LLC



Kathleen C. Barnes

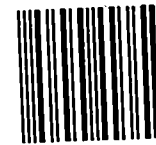
Enclosures

cc: Sean A. O'Connor  
R. Thayer Rivers, Jr.  
George W. Cone (via e-mail)

Barnes Law Firm, LLC  
Post Office Box 897  
Hampton, SC 29924



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The Honorable Jenny Abbott Kitchings  
Clerk of Court for the Court of Appeals  
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