

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY

Special Referee

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

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MAY 19 2016

SC Court of Appeals

Appellate Case No.: 2015-002194

Vanderbilt Mortgage and Finance, Inc., Respondent

v.

Ashton C. Bull, Linda Bull, Park Avenue Homes, South Carolina Department of Motor Vehicles,
Defendants, of whom Ashton C. Bull, Linda Bull are the Appellants

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 May 27, 2016.

For these reasons, the undersigned moves for an extension of time pursuant to Rule 263(a) SCAR. 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 Representative therefore requests the Initial Brief and Designation of Matter be due for service on June 27, 2016.

Respectfully submitted,

Crawford & von Keller, LLC

By: _____

Theodore von Keller

B. Lindsay Crawford, III

Sara C. Hutchins

Attorneys for Respondent

May, 16, 2016
Columbia, SC

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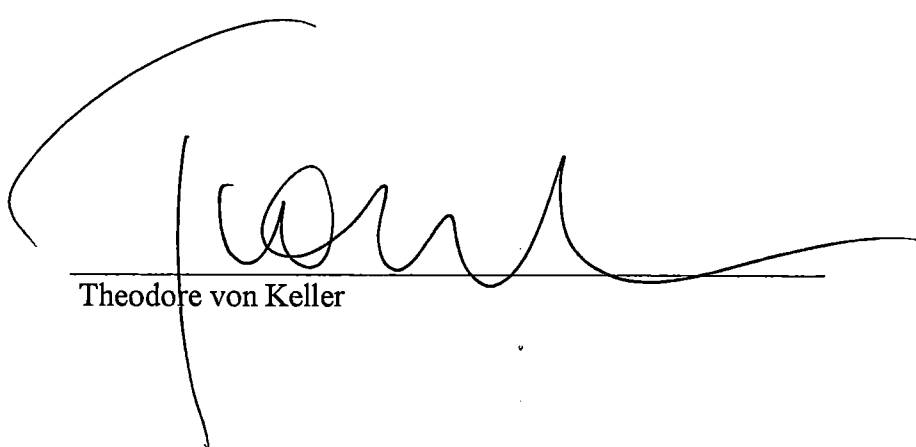
v.

Ashton C. Bull, Linda Bull, Park Avenue Homes, South Carolina Department of Motor Vehicles,
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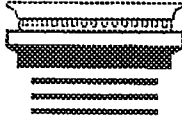
PROOF OF SERVICE

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 May 16, 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

May 16, 2016

Hand Delivery and U.S. Mail

The Honorable Kenneth A. Richstad
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Vanderbilt Mortgage vs Ashton Bull
Appellate Case No: 2015-002194
Our file no.: 6310.4587

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SC COURT OF APPEALS

Dear Mr. Richstad:

Enclosed please find the original and a copy of the **Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter** in the above referenced matter. Please file the original and return a clocked copy in the enclosed envelope.

Please contact me with any questions.

Sincerely,

Crawford & von Keller, LLC

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

/prt

cc: Marcus LeFond Woodson, Esquire

Crawford & von Keller LLC
PO Box 4216
Columbia SC 29240

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