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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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

**RECEIVED**  
JUN 01 2016  
SC Court of Appeals

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 S. 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, 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, and Ruth  
C. Dowell, are ..... Respondents

**Motion for an Extension of Time**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant  
JPMorgan Chase Bank, National Association respectfully requests a ten (10) day

extension of time to file its Initial Reply Brief in the above-captioned appeal. This is the second request for an extension of this deadline. Counsel for Respondents has consented to this request.

This request is necessitated due to undersigned counsel's numerous other work conflicts, scheduling deadlines, other court appearances/filings, and travel obligations that conflict with the current deadline. Currently, Appellant's Initial Reply Brief is due on June 6, 2016. Appellant requests a ten (10) day extension of time until June 16, 2016. Appellant will not seek any further extension of this deadline absent extraordinary circumstances.

Therefore, Appellant requests that this Court enter an order extending the deadline for its Initial Reply Brief until June 16, 2016. Appellant requests that the current deadline be held in abeyance while the Court considers this request.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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Attorneys for JPMorgan Chase Bank, National  
Association

Columbia, South Carolina

June 1, 2016

THE STATE OF SOUTH CAROLINA  
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**PROOF OF SERVICE**

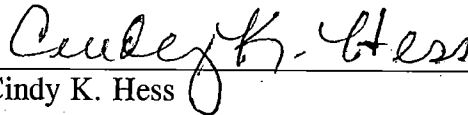
I, the undersigned Senior Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for JPMorgan Chase Bank, National Association, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **Motion for an Extension of Time**

Counsel Served:

**U.S. Mail**

Alice F. Paylor, Esq.  
Rosen Rosen & Hagood, LLC  
Post Office Box 893  
Charleston, SC 29402



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Cindy K. Hess  
Sr. Administrative Assistant

June 1, 2016

# Nelson Mullins

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JUN 01 2016

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SC Court of Appeals

June 1, 2016

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

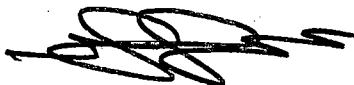
RE: JPMorgan Chase Bank, National Association v. Delilah Star Acheson, et al.  
Appellant Case No. 2016-00028  
Our File No. 11281/02229

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven copies of Appellant's Motion for an Extension of Time, along with a check for the filing fee. We would ask that you file the original and return a clocked-in copy to us via our courier.

By copy of this letter to counsel of record, we are serving them with copies of this document.

Very truly yours,



Michael J. Anzelmo

MJA:ckh  
Enclosures  
cc: Alice F. Paylor, Esquire