

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity Judge

Case No.: 2012-CP-42-3549
2012-CP-42-2874

Appellate Case No. 2016-000099

U.S. Bank, NA, as trustee
relating to the Chevy Chase
Funding, LLC Mortgage
Backed Certificates, Series
2004-B,

Plaintiff,

v.

Alyce F. Otto, Individually;
Alyce F. Otto Trustee Under
Declaration of Trust of Alyce
F. Otto dated the 17th of
November 2009; TD Bank,
NA; The United States of
America, acting by and
through its agency, the
Internal Revenue Service;
Laura Kerhulas Giese, as Co-
Trustee of the Theodore
Ernest Kerhulas Trust Under
Declaration of Trust dated
May 25, 2004; Mark Warner
Kerhulas, as Co-Trustee of the
Theodore Ernest Kerhulas
Trust Under Declaration of
Trust dated May 25, 2004;
Jackson L. Munsey, Jr.;
Citibank, NA,

Defendants,

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SC Court of Appeals

Of whom Jackson L. Munsey,
Jr., is the Appellant.

and

U.S. Bank, NA and Alyce F.
Otto are the Respondents.

Alyce F. Otto, Trustee, Plaintiff,

v.

Jackson L. Munsey, Jr., Defendant,

**MOTION FOR FIRST EXTENSION OF TIME WITHIN
WHICH TO SERVE AND FILE RECORD ON APPEAL**

Appellant ("Jackson L. Munsey, Jr."), through his undersigned counsel, would respectfully show unto the Court as follows:

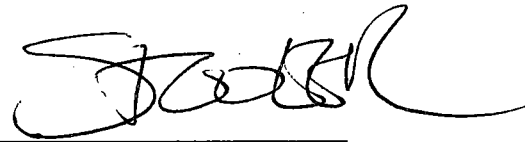
I.

The Record on Appeal was due to be served and filed on June 6, 2016. We would hereby respectfully request an additional 30 days within which to correctly file and serve the Record on Appeal in this matter. Undersigned counsel does not believe this request will result in any prejudice to the Respondent should it be granted.

II.

The extension request is not intended for purposes of delay, but rather to ensure that the Record on Appeal in this matter is correctly and properly filed and served.

WHEREFORE, Appellant prays that the Court grant the Appellant's Motion for Extension of Time to file the Record on Appeal in this case for an additional thirty (30) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.



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Samuel B. Tooker (S.C. Bar # 78999)

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Munsey, Jr.

May 26, 2016

Cc: Erica Greer Lybrand, Esq.
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Sarah Patrick Spruill, Esq.
George John Conits, Esq.
William Price Stork, Esq.
Citibank, NA
Erin Culbertson, Esq.

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Jackson L. Munsey, Jr.;

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SC Court of Appeals

Citibank, NA,	Defendants,
Of whom Jackson L. Munsey, Jr., is the	Appellant.
and	
U.S. Bank, NA and Alyce F. Otto are the	Respondents.
Alyce F. Otto, Trustee,	Plaintiff,
	v.
Jackson L. Munsey, Jr.,	Defendant,

PROOF OF SERVICE

I, Samuel Tooker, certify that I have served the Motion for First Extension of Timy Within Which to Serve and File Record on Appeal, by depositing a copy of the same in the United States mail, on the 26th day of May 2016 postage prepaid, addressed to:

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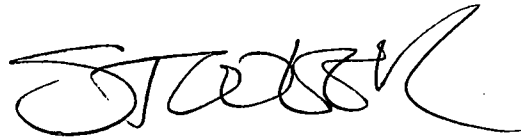
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Attorneys for the Appellant Jackson L. Munsey, Jr.



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DAVID R. PRICE, JR., P.A. MAY 31 2016

ATTORNEYS AT LAW

SC Court of Appeals

DAVID R. PRICE, JR.

SAMUEL B. TOOKER

May 26, 2016

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: U.S. Bank, NA, as trustee relating to the Chevy Chase Funding, LLC
Mortgage Backed Certificates, Series 2004-B v. Alyce F. Otto, et. al.
AND
Alyce F. Otto, Trustee v. Jackson L. Munsey, Jr.
Of Whom Jackson L. Munsey, Jr., is the Appellant
C.A. No.: 2012-CP-42-3549
2012-CP-42-2874

Dear Ms. Kitchings:

The Brief of Respondent in the above referenced appeal is due to be served and filed on June 6, 2016. However, this is to respectfully request a 30-day extension to serve and file this Brief of Respondent.

This extension request is not intended for the purpose of delay. Rather, this extension request is necessitated by a heavy workload and is for good cause.

Sincerely,

Campbell Price
Legal Assistant

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