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SC Court of Appeals

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,

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,

REQUEST FOR EXTENSION OF TIME

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

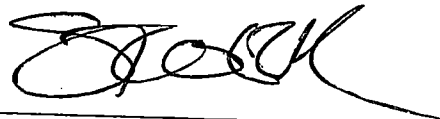
I.

The Appellant's Initial Brief and Designation of Matter to be Included in 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 Appellant's Initial Brief and Designation of Matter to be Included in 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 Appellant's Initial Brief and Designation of Matter is correctly and properly researched, the issues identified, and the Appellant's Brief prepared.

WHEREFORE, Appellant prays that the Court grant the Appellant's Motion for Extension of Time to file Appellant's Initial Brief and Designation of Matter to be Included in 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.



David R. Price, Jr. (S.C. Bar # 75140)
Samuel B. Tooker (S.C. Bar # 78999)
DAVID R. PRICE, JR., P.A.
318 West Stone Avenue (29609)
Post Office Box 2446
Greenville, South Carolina 29602-2446
(864) 271-2636 office
(864) 271-2637 fax
David@GreenvilleLegal.com
Sam@GreenvilleLegal.com
Attorneys for the Appellant Jackson L.
Munsey, Jr.

May 31, 2016

Cc: Erica Greer Lybrand, Esq.
David L. Walsh, Esq.
Kenneth C. Anthony, Jr., Esq.
Sarah Patrick Spruill, Esq.
George John Conits, Esq.
William Price Stork, Esq.
Citibank, NA
Erin Culbertson, Esq.

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2004-B,

Plaintiff,

v.

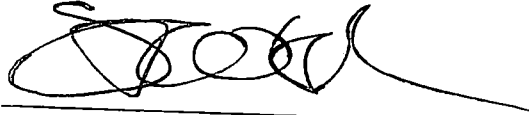
Alyce F. Otto, Individually;
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Theodore Ernest Kerhulas
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Trust dated May 25, 2004;
Jackson L. Munsey, Jr.;

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 Time Within Which to Serve and File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal, by depositing a copy of the same in the United States mail, on the 31st day of May 2016 postage prepaid, addressed to:

- | | |
|--|--|
| Erica Greer Lybrand, Esq.
220 Executive Center Dr.
Columbia, SC 29210 | William Price Stork, Esq.
3800 Fernandina Rd.
Suite 110
Columbia, SC 29210 |
| David L. Walsh, Esq.
PO Box 5156
Spartanburg, SC 29304 | Citibank, NA
710 East 60th Street North
Sioux Falls, SD 57104
(605) 331-2626 - Office |
| Kenneth C. Anthony, Jr., Esq.
P.O. Box 3565
250 Magnolia Street (29306)
Spartanburg, SC 29304 | Erin Culbertson, Esq.
114 Manly St.
Greenville, SC 29601 |
| Ms. Sarah Patrick Spruill, Esq.
P.O. Box 2048
Greenville, SC 29602 | George John Conits, Esq.
55 Beattie Place, St. 700
Greenville, SC 29601 |



David R. Price, Jr. (S.C. Bar # 75140)

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

DAVID R. PRICE, JR., P.A.

318 West Stone Avenue (29609)

Post Office Box 2446

Greenville, South Carolina 29602-2446

(864) 271-2636 office

(864) 271-2637 fax

David@GreenvilleLegal.com

Sam@GreenvilleLegal.com

Attorneys for the Appellant Jackson L.

Munsey, Jr.



DAVID R. PRICE, JR., P.A.
ATTORNEYS AT LAW

DAVID R. PRICE, JR.

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SAMUEL B. TOOKER

June 6, 2016

JUN 08 2016

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

SC Court of Appeals

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 Appellant's Initial Brief and Designation of Matter to be Included in the Records on Appeal 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 Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal; Also included is a check for \$25.00

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

Enclosures

Mailing Address:
POST OFFICE BOX 2446
GREENVILLE, SC 29602

318 WEST STONE AVENUE
GREENVILLE, SOUTH CAROLINA
29609

Telephone: (864) 271-2636
Facsimile: (864) 271-2637
GREENVILLELEGAL.COM

Cc: Erica Greer Lybrand, Esq.
Kenneth C. Anthony, Jr., Esq.
Sarah Patrick Spruill, Esq.
Erin Culbertson, Esq.



DAVID R. PRICE, JR., P.A.

ATTORNEYS AT LAW

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Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
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