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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

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SC Court of Appeals

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,

MOTION FOR EXTENSION OF TIME

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

I.

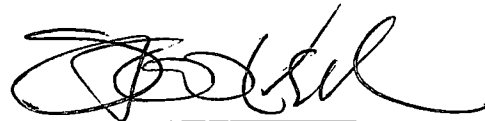
The Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal was due to be served and filed on July 6, 2016. We would hereby respectfully request an additional 14 days within which to correctly file and serve the Appellant’s Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. 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. Appellant’s counsel has already begun this task; counsel merely requires an additional 14 days to ensure the matter is thoroughly researched

and briefed.

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 fourteen (14) 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.

June 29, 2016

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



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DAVID R. PRICE, JR., P.A. JUL 01 2016

ATTORNEYS AT LAW

SC Court of Appeals

DAVID R. PRICE, JR.

SAMUEL B. TOOKER

June 29, 2016

The Honorable Jenny A. Kitchings
Clerk, SC 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 Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced case is due to be served and filed on July 6, 2016. However, Appellant respectfully requests a 14-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

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Jenny Abbot Kitchings
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South Carolina Court of Appeals
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