

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

JUL 06 2016

**SC Court of Appeals**

James O. Spence, Master in Equity, Lexington County

Appellate Case No.: 2016-000856

Deutsche Bank National Trust Company, as Trustee for Structured Asset Investment  
Loan Trust Mortgage Pass through Certificate Series 2004-1.....Respondent,

v.

Steven E. Sharpe; Sherry L. Sharpe; The United States of America, acting by and through  
its agent, Internal Revenue Service; The State of South Carolina Department of  
Revenue.....Defendants,

Of whom

Steven E. Sharpe and Sherry L. Sharpe, are.....Appellants.

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**RESPONDENT’S RETURN TO APPELLANT’S MOTION TO REINSTATE  
APPEAL AND TO STAY TIME LIMITS**

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Deutsche Bank National Trust Company, as Trustee for Structured Asset  
Investment Loan Trust Mortgage Pass through Certificate Series 2004-1 (“Respondent”),  
hereby submits its Return to Appellant’s Motion to Reinstate Appeal and to Stay Time  
Limits.

Respondent is sympathetic to opposing counsel's basis for requesting that the above referenced appeal be reinstated and for a stay in the time limits. However, if the appeal is reinstated Respondent objects to any indefinite stay of time limits as set out in the South Carolina Appellate Court Rules. A lack of definiteness in proposing a deadline has the potential to unduly burden the Court and the Respondent to this action by increasing the costs of litigation, delaying the administration of justice, and unnecessarily occupying the resources of the Court.

Respondent respectfully requests that if the appeal is reinstated that Appellant be given no more than 60 days in which it file their Initial Brief as required by Rule 208, SCACR.

Respectfully submitted,

July 6, 2016



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Charles S. Gwynne Jr. (SC Bar # 73844)

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ATTORNEYS FOR PLAINTIFF

Rogers Townsend & Thomas, PC and its staff are debt collectors

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its agent, Internal Revenue Service; The State of South Carolina Department of  
Revenue.....Defendants,

Of whom

Steven E. Sharpe and Sherry L. Sharpe, are.....Appellants.

**PROOF OF SERVICE**

I HEREBY CERTIFY that I have served the **RESPONDENT'S RETURN TO APPELLANT'S MOTION TO REINSTATE APPEAL AND TO STAY TIME LIMITS** on Appellants and other Defendants by depositing copies of it in the United States Mail, postage prepaid, on July 6, 2016, at the addresses shown on the attachment listing Other Counsel of Record and Parties.



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Other Counsel of Record:

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LICENSED IN SOUTH CAROLINA



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JUL 06 2016

**SC Court of Appeals**

July 6, 2016

**VIA HAND DELIVERY**

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

RE: Deutsche Bank National Trust Company, as Trustee for Structured Asset  
Investment Loan Trust Mortgage Pass through Certificate Series 2004-1  
**Appellate Case No.: 2016-000856**  
C/A No.: 08-CP-32-3594  
Our file: 511784.07494

Dear Ms. Kitchings:

Enclosed are the original and seven (7) copies of the Respondent's Return to Appellant's Motion to Reinstate Appeal and to Stay Time Limits, along with a Proof of Service. Please return a filed copy of the document to me.

By copy of this letter, I am serving a copy of the Respondent's Return to Appellant's Motion to Reinstate Appeal and to Stay Time Limits and Proof of Service on all parties to this appeal.

Thank you for your assistance in this matter.

With kind personal regards, I am

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Charles S. Gwynne Jr.", written in black ink.

Charles S. Gwynne Jr.

/ow  
Enclosures as stated

cc:

Douglas Kosta Kotti, Esquire  
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