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THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

SC Court of Appeals

80094

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Hon. S. Jackson Kimball III  
Master in Equity

Case no. 2011-CP-46-250

Bank of America, N.A., as successor by merger to BAC Home Loans  
Servicing, LP, f/k/a/ Countrywide Home Loans Servicing, LP FKA  
Countrywide Home Loans Servicing, LP.....RESPONDENT

vs.

Michelle Minardi and Ameris Bank,  
of whom Defendant Michelle Minardi is the .....APPELLANT

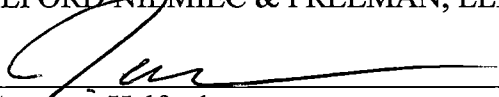
MOTION FOR EXTENSION  
TO FILE FINAL BRIEFS

Counsel for Appellant hereby respectfully moves the court for an extension of  
time for Appellant and Respondent to file final briefs to accommodate vacation schedules  
of Appellant Counsel and Respondent Counsel, through August 5, 2016 per consent  
agreement of counsel.

Appellant prays that the Court of Appeals enter an Order granting Appellant and  
Respondent extension until August 5, 2016 for filing of final briefs.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP



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S.C. Bar 17184  
238 Rockmont Drive  
Fort Mill, South Carolina 29708  
803-547-6618  
803-547-6638 fax  
cam@fortmilllaw.com  
Attorney for Appellant Michelle Minardi

PROOF OF SERVICE

I hereby certify that I am the attorney for the Appellant Michelle Minardi in the above captioned case and that I did on June 29, 2016 serve a copy of the foregoing MOTION TO EXTEND DEADLINES FOR FINAL BRIEF on counsel for the counsel identified below, by e-mail delivery and U.S. mail, postage prepaid, and addressed as follows:

Brian A. Calub, Esq.  
McGuire Woods, L.L.P.  
201 N. Tryon Street,  
Charlotte, North Carolina 28202  
*Attorneys for Bank of America, N.A.*

HALFORD NIEMIEC & FREEMAN, LLP



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**SC Court of Appeals**

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June 29, 2016

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

Re: Bank of America, N.A., as successor by merger to BAC Home Loans  
Servicing, LP, f/k/a Countrywide Home Loans Servicing, LP vs.  
Michelle Minardi and Ameris Bank  
Case No.: 2011-CP-46-250  
Appellate Case No.: 2015-001857

Dear Ms. Kitchings:

I am herewith enclosing a consent motion to extend deadlines for filing of final briefs for both parties along with the filing fee. The record on appeal has been prepared as of June 29, 2016. I would appreciate the court consideration of this motion to accommodate vacation scheduling. Please notify me should there be any questions or concerns.

With kind personal regards, I remain

Sincerely,

  
J. Cameron Halford

JCH:tml

Enclosure

cc: Brian Calub, Esq. (email)

^ MEDIATOR AND ARBITRATOR

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