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JUL 18 2016
SC Court of Appeals

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July 15, 2016

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
Post Office Box 11330
Columbia, South Carolina 29211

Re: Quicken Loans, Inc. v. Wayne D. Wilson, et al.
Appellate Case No.: 2016-001404
Civil Action No.: 2015-CP-06-00070
Our File No.: 8275.001

Dear Mr. Shearouse:

Please be notified that Appellant's Return in Opposition to Motion to Certify and Transfer Appeal was received on July 14, 2016. According to the Certificate of Service, service was effected on July 11, 2016, and Respondent's Reply under the rules is due on Monday, July 18, 2016. We respectfully request an extension of that deadline to Monday, July 25.

We have not previously requested an extension in this matter. Kindly treat this letter as a Motion. Enclosed is the motion filing fee of \$25.00 as required. The extension is needed due to the current workloads of the counsel of record, including additional and unexpected briefing demands due to developments in other matters, motions hearings and other hearings previously scheduled, scheduled depositions, and other deadlines, and related matters and the loss of 3-days' time for responding due to mailing (11th to 14th). This request is made for good cause and the Respondents respectfully request to be allowed the additional time requested. The Court is asked to stay and hold in abeyance the time limits set forth in Rule 240(f), SCACR, until a decision is made on this request.

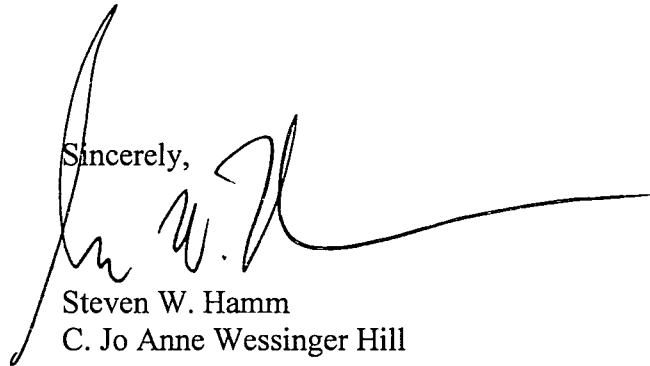
Prior to filing this motion, the counsel for Respondent's attorney, C. Jo Anne Wessinger Hill, did consult with counsel for the Appellants, A. Mattison Bogan, Esquire, and was advised that the Appellants counsel were unable to advise of any position (no-objection, consent, etc.)

related to Respondents' request for a one additional week extension until permission was provided by their client. Appellants counsel emailed their client while on the phone with attorney Hill and stated that he would advise later today on whether or not Appellant's consent, object, or have no objection to this first request for extension by Respondents. At the time of this filing, Respondents have consulted with opposing counsel by telephone and have attempted in good faith to resolve the matter contained in the motion; however, it appears that such consultation did not provide any answer and served no useful purpose.

We respectfully thank you for consideration of this request which is made for good reason and cause as explained herein.

With kindest regards, we are

Sincerely,

A handwritten signature in black ink, appearing to read 'S.W. Hamm', with a long horizontal flourish extending to the right.

Steven W. Hamm
C. Jo Anne Wessinger Hill

SWH/CJWH/smh

cc: The Honorable Jenny Abbott Kitchings, Clerk of Court, SC Court of Appeals
B. Rush Smith, III
A. Mattison Bogan
Carmen Harper Thomas
Brian M. Barnwell
C. Bradley Hutto
Daniel W. Williams
Charles L. Dibble
Warren R. Herndon, Jr., Esquire (via email only)

THE STATE OF SOUTH CAROLINA

In the Supreme Court

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JUL 18 2016

SC Court of Appeals

APPEAL FROM BARNWELL COUNTY

Court of Common Pleas

J. Martin Harvey, Special Referee

Circuit Court Civil Action No. 2015-CP-06-00070

Appellate Case No. 2016-001404

Quicken Loans, Inc.,

Appellant,

v.

Wayne D. Wilson; Calvin O. Wilson, III; Any other Heirs-in-Law or devisees of Ezekiel (Ellen) T. Wilson, deceased, their heirs, personal representatives, administrators, successors and assigns, and all other persons entitled to claim through them; all unknown persons with any right, title or interests in the real estate described herein; also any persons who may be in a class designated as John Doe; any unknown minors or persons under a disability being a class designated as Richard Roe; Park Sterling Bank,

Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of RICHARDSON PLOWDEN & ROBINSON, P.A., attorneys for Respondent, does hereby certify that service of the pleadings below referenced in the above-captioned matter was made upon all counsel of record this 15 day of July, 2016, by electronic mail and by depositing a copy of same in the U.S. Mail, postage prepaid, addressed as follows:

Pleadings:

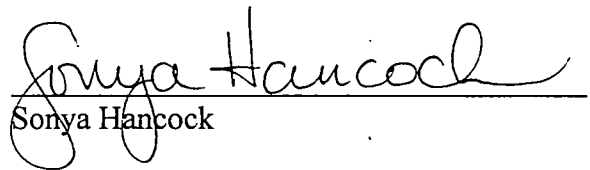
RESPONDENTS' MOTION FOR EXTENSION
(LETTER DATED JULY 15, 2016, TO S.C. SUPREME COURT)

Counsel Served:

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Columbia, SC
July 15, 2016


Sonya Hancock

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

29211-162929

