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IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Dale Van Slambrook, Master in Equity

Case No. 2016-000292

**RECEIVED**  
AUG 12 2016  
SC Court of Appeals

Branch Banking and Trust Company..... Plaintiff/ Respondent,

v.

Wilton H. Cain; Cassandra M. Durrah-Cain;  
Liberty Hall Residential Property Owners  
Association, Inc..... Defendants,

Of whom Wilton H. Cain and  
Cassandra M. Durrah-Cain are the..... Appellants.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE BRIEF**

Respondent Branch Banking and Trust Company hereby moves for an extension of time to file and serve its Initial Brief and Designation of Matter due to counsel's heavy workload and an unforeseen family matter. The present deadline for service and filing of Respondent's Initial Brief and Designation of Matter is August 12, 2016.

Respondent's counsel requests a 30 day extension. This request is not intended for the purpose of delay. Rather, Respondent's counsel believes that there is good cause to grant the requested extension to September 12, 2016, due to the aforesaid reasons.

✓

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file Respondent's Initial Brief and Designation of Matter for an additional 30 days, to September 12, 2016.

Respectfully submitted,



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Erica G. Lybrand (SC Bar # 79052)  
ROGERS TOWNSEND & THOMAS, PC  
Post Office Box 100200(29202)  
1221 Main Street, 14<sup>th</sup> Floor  
Columbia, South Carolina 29201  
(803)771-7900  
Attorney for the Respondent  
*Rogers Townsend & Thomas, PC and its staff are debt collectors*

August 11, 2016

IN THE STATE OF SOUTH CAROLINA  
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APPEAL FROM BERKELEY COUNTY  
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Association, Inc..... Defendants,

Of whom Wilton H. Cain and  
Cassandra M. Durrah-Cain are the..... Appellants.

**PROOF OF SERVICE**

I HEREBY CERTIFY that I have served the **RESPONDENT'S MOTION FOR EXTENSION OF TIME** on Appellants Wilton H. Cain and Cassandra M. Durrah-Cain by depositing copies of it in the United States Mail, postage prepaid, on August 11, 2016, addressed to Appellants Wilton H. Cain and Cassandra M. Durrah-Cain at 6476 N. Highway 17, Awendaw, SC 29429.



Erica G. Lybrand (SC Bar # 79052)  
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August 11, 2016

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AUG 12 2016

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals Clerk of Court  
1015 Sumter Street  
Columbia, SC 29201

RE: *Branch Banking and Trust Company v. Wilton H. Cain; Cassandra M. Durrah-Cain; Liberty Hall Residential Property Owners Association, Inc.*  
C/A # 2010-CP-08-03514  
RTT File # 504335-02111

Dear Ms. Kitchings:

Enclosed are an original and one copy of Respondent's Motion for Extension of Time to File Brief and Proof of Service in the above referenced matter. Also enclosed is a check in the amount of \$25.00 representing the motion filing fee. Please file the original document, and return the clocked copy to me in the envelope provided for the Court's convenience.

With kind regards, I remain

Cordially yours,

A handwritten signature in black ink, appearing to read "Karissa Richardson".

Karissa Richardson  
Paralegal for Erica G. Lybrand

Enclosures

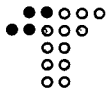
cc:

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Cassandra M. Durrah-Cain  
2886 Palmer Drive  
Charleston, SC 29414

Wilton H. Cain  
Cassandra M. Durrah-Cain  
6476 North Hwy 17  
Awendaw, SC 29429

The Honorable Mary P. Brown  
Clerk of Court for Berkeley County  
P.O. Box 219  
Moncks Corner, SC 29461



ELJKS

**ROGERS TOWNSEND**  
ATTORNEYS AT LAW

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals Clerk of  
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1015 Sumter Street  
Columbia, SC 29201

GYX-SMP 29201

