

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas Case No. 2011-CP-10-812
The Honorable Mikell R. Scarborough, Master-In-Equity

APPELLATE CASE NO. 2016-00155

NATIONSTAR MORTGAGE LLC

Respondent,

v.

RHONDA MEISNER,

Petitioner.

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SEP 09 2016

S.C. SUPREME COURT

**RESPONDENT'S MOTION FOR LEAVE TO FILE OUT OF TURN RESPONDENT'S
RETURN TO PETITIONER'S PETITION FOR WRIT OF CERTIORARI**

The undersigned counsel for Respondent Nationstar Mortgage LLC ("Nationstar"), pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, hereby submits this Motion for Leave to File Return to Petitioner's Petition for Writ of Certiorari.

The grounds for this motion are that Respondent received Petitioner's Petition for Writ of Certiorari on August 3, 2016 by regular U.S. mail. Respondent received a Certificate of Service and Proof of Service from the Petitioner indicating that the Petition was filed on July 27, 2016. When the Petition for Writ of Certiorari was received, Respondent's attorney was in a three-week jury trial in the case of *Life for Relief and Development vs. Bank of America, N.A.* Case No. 2:12-cv-13550 in the United States District Court for the Eastern District of Michigan. Respondent's attorney has prepared a return to Petitioner's Petition for Writ of Certiorari but due

to an administrative error the actual response time was improperly calendared on Respondent's attorney's calendar and scheduled for filing deadline of September 9, 2016.

Respondent's attorneys request that this Honorable Court to allow Respondent's counsel to file out of turn its Return to Petitioner's Writ of Certiorari.

Respondent's counsel believes that no party will be prejudiced by this Honorable Court granting Respondent's motion for leave to file out turn its Return to Petitioner's Writ of Certiorari.

This motion is not made for any unlawful or dilatory purpose.

Respectfully submitted, this 8th day of September, 2016.

MCGUIREWOODS LLP

Robert Muckenfuss by Denise McRely w/permission
Robert A. Muckenfuss (SC Bar #13903) NC Bar No.

MCGUIREWOODS LLP
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2000
Facsimile: (704) 343-2300
rmuckenfuss@mcguirewoods.com

47940

Attorney for Respondent Nationstar Mortgage LLC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **RESPONDENT'S FOR LEAVE TO MOTION TO FILE OUT OF TURN RESPONDENT'S RETURN TO PETITIONER'S PETITION FOR WRIT OF CERTIORARI** has been served upon the parties in this action by mailing a copy thereof, postage prepaid, to the following:

Rhonda Lewis Meisner
Post Office Box 689
Blythewood, SC 29016

Pro Se Plaintiff

This the 8th day of September, 2016.

Robert Muckenfuss by Anne Kelly w/permission
Robert A. Muckenfuss (SC Bar #13903) NC Bar No.
47940

McGuireWoods LLP
Fifth Third Center
201 North Tryon Street
Suite 3000
Charlotte, NC 28202
Tel 704.343.2000
Fax 704.343.2300
www.mcguirewoods.com

Antoine L. Robinson
Direct: 704.343.2047

McGUIREWOODS

arobinson@mcguirewoods.com
Direct Fax: 704.444.8813

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S.C. SUPREME COURT

September 8, 2016

Federal Express Mail

Ms. Linda Allen
Clerk, Supreme Court of South Carolina
1231 Gervais Street
Columbia, SC 29201

Re: *Nationstar Mortgage. LLC vs. Rhonda Lewis Meisner*
South Carolina Supreme Court No. 2016-00155
Charleston County Case No. 2011-CP-10-812

Dear Ms. Allen:

Per our phone conversation on today, September 8, 2016, please find enclosed an original and six (6) copies of the below listed documents to be filed with your Court.

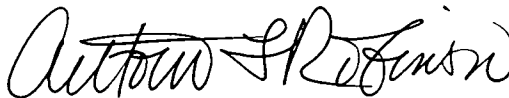
1. **Respondent Nationstar Mortgage LLC's Motion for Leave to File Out of Turn Respondent's Return to Petition for Writ of Certiorari; and**
2. **Respondent Nationstar Mortgage LLC's Return to Petition for Writ of Certiorari.**

Please file the originals and return the certified copies to me in the self-addressed stamped envelope provided for your convenience.

Thank you in advance for your kind consideration in this matter. Should you have any questions, please do not hesitate to contact me.

Sincerely,

McGuireWoods LLP



Antoine L. Robinson, NCCP
Senior Paralegal

Enclosures

cc: Ms. Rhonda Meisner