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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity Judge

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Case No.: 2012-CP-42-3549  
2012-CP-42-2874

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Appellate Case No. 2016-000099

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U.S. Bank, NA, as trustee  
relating to the Chevy Chase  
Funding, LLC Mortgage  
Backed Certificates, Series  
2004-B,

Plaintiff,

v.

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SEP 28 2016

SC Court of Appeals

Alyce F. Otto, Individually;  
Alyce F. Otto Trustee Under  
Declaration of Trust of Alyce  
F. Otto dated the 17<sup>th</sup> of  
November 2009; TD Bank,  
NA; The United States of  
America, acting by and  
through its agency, the  
Internal Revenue Service;  
Laura Kerhulas Giese, as Co-  
Trustee of the Theodore  
Ernest Kerhulas Trust Under  
Declaration of Trust dated  
May 25, 2004; Mark Warner  
Kerhulas, as Co-Trustee of the  
Theodore Ernest Kerhulas  
Trust Under Declaration of  
Trust dated May 25, 2004;  
Jackson L. Munsey, Jr.;  
Citibank, NA,

Defendants,

Of whom Jackson L. Munsey,  
Jr., is the

Appellant.

and

U.S. Bank, NA and Alyce F.  
Otto are the

Respondents.

Alyce F. Otto, Trustee,

Plaintiff,

v.

Jackson L. Munsey, Jr.,

Defendant,

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**MOTION FOR EXTENSION OF TIME**

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Appellant ("Jackson L. Munsey, Jr."), through his undersigned counsel, would respectfully show unto the Court as follows:

I.

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The Appellant's Reply Brief was due to be served and filed on September 29, 2016. We would hereby respectfully request an additional 21 days within which to correctly file and serve the Appellant's Reply Brief in this matter. Undersigned counsel does not believe this request will result in any prejudice to the Respondent should it be granted.

**II.**

The extension request is not intended for purposes of delay, but rather to ensure that the Appellant's Reply Brief is correctly and properly researched, the issues identified, and the Appellant's Brief prepared.

**WHEREFORE**, Appellant prays that the Court grant the Appellant's Motion for Extension of Time to file Appellant's Reply Brief in this case for an additional twenty-one (21) days from the date such relief is granted; and for such other and further relief as the Court may deem just and proper.

  
David R. Price, Jr. (S.C. Bar # 75140)  
Samuel B. Tooker (S.C. Bar # 78999)  
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Attorneys for the Appellant Jackson L. Munsey, Jr.

September 26, 2016

Cc: Erica Greer Lybrand, Esq.  
Sarah Patrick Spruill, Esq.  
Kenneth C. Anthony, Esq.  
David L. Walsh, Esq.  
Richard C. Keller, Esq



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**DAVID R. PRICE, JR., P.A.**  
ATTORNEYS AT LAW

SC Court of Appeals

DAVID R. PRICE, JR.

SAMUEL B. TOOKER

September 26, 2016

The Honorable Jenny A. Kitchings  
Clerk, SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**Re: U.S. Bank, NA, as trustee relating to the Chevy Chase Funding, LLC**  
**Mortgage Backed Certificates, Series 2004-B v. Alyce F. Otto, et. al.**  
**AND**  
**Alyce F. Otto, Trustee v Jackson L. Munsey, Jr.**  
**Of Whom Jackson L. Munsey, Jr., is the Appellant**  
C.A. No.: 2012-CP-42-3549  
2012-CP-42-2874

Dear Ms. Kitchings:

The Appellant's Reply Brief in regards to the above referenced appeal is due to be served and filed on September 29, 2016. However, this is to respectfully request a 21-day extension to serve and file Appellant's Reply Brief; Also included is a check for \$25.00

This extension request is not intended for the purpose of delay. Rather, this extension request is necessitated by a heavy workload and is for good cause.

Sincerely,

Campbell Price  
Legal Assistant

Enclosures

Cc: Erica Greer Lybrand, Esq.

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**DAVID R. PRICE, JR., P.A.**

ATTORNEY AT LAW

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The Honorable Jenny Kitchings  
Court of Appeals  
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