

81307

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

Appellate Case No. 2015-002049
Civil Action No.: 2013-CP-27-00253

RECEIVED
OCT 19 2016
SC Court of Appeals

Bank of Walterboro Plaintiff/Respondent,

v.

Charles E. Bush, aka Charles Bush, Rosemelle M. Shuler, First Family
Financial Services of Georgia, Inc., EquiFirst corporation, Mortgage
Electronic Registration Systems, Inc., as nominee for BNC Mortgage Inc.,
And South Carolina Department of Revenue Defendants,

Of Whom Mortgage Electronic Registrations Systems, Inc., is the Appellant,

And

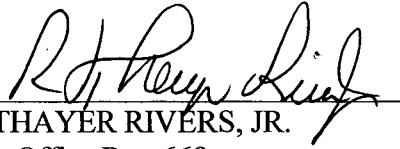
Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

**RESPONDENT ROSEMELLE M. SHULER'S
MOTION TO FILE FINAL BRIEF OUT OF TIME**

The Respondent Shuler hereby moves to file her Final Brief out of time. This motion is based on the grounds that the attorney the Respondent Shuler was out of the country at the time the Record on Appeal was served, and the deadline for filing and serving the Respondent's Final Brief was not put on the calendar.

October 17, 2016.

Law Office of R. Thayer Rivers, Jr.



R. THAYER RIVERS, JR.

Post Office Box 668

Ridgeland, South Carolina 29936

(843) 726-8136

Other Counsel of Record:

Sean A. O'Connor, Esquire
Finkel Law Firm, LLC
4000 Faber Place Drive, Suite 400
North Charleston, SC 29405
Attorney for the Appellant

George W. Cone, Esquire
McLeod Fraser & Cone, LLC
Post Office Box 230
Walterboro, SC 29488
Attorney for Respondent, Bank of Walterboro

Kathleen C. Barnes, Esquire
Barnes Law Firm, LLC
Post Office Box 897
Hampton, SC 29924
Attorney for the Respondent, Bank of Walterboro

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 19 2016
SC Court of Appeals

APPEAL FROM JASPER COUNTY

Darrell Thomas Johnson, Jr., Special Referee

Appellate Case No. 2015-002049
Civil Action No.: 2013-CP-27-00253

Bank of Walterboro Plaintiff/Respondent,

v.

Charles E. Bush, aka Charles Bush, Rosemelle M. Shuler, First Family
Financial Services of Georgia, Inc., EquiFirst corporation, Mortgage
Electronic Registration Systems, Inc., as nominee for BNC Mortgage Inc.,
And South Carolina Department of Revenue Defendants,

Of Whom Mortgage Electronic Registrations Systems, Inc., is the Appellant,

And


Bank of Walterboro and Rosemelle M. Shuler are the Respondents.

PROOF OF SERVICE

I certify that I have served the Respondent Rosemelle M. Shuler's Motion to File Final Brief Out of Time on the Appellant by depositing a copy of same in the United States Mail, postage prepaid, on October 17, 2016 addressed to its attorney of record, Sean A. O'Connor, Finkel Law Firm, LLC, 4000 Faber Place Drive, Suite 400, North Charleston, SC, 29405, and to the Respondent, Bank of Walterboro, by depositing a copy of same in the United States Mail, postage prepaid, on March 10, 2016 addressed to its attorneys of record George W. Cone, Post Office Box 230, Walterboro, SC, 29488, and Kathleen C. Barnes, Post Office Box 897, Hampton, SC, 29924.

October 17, 2016.

Law Office of R. Thayer Rivers, Jr.



R. THAYER RIVERS, JR.

Post Office Box 668

Ridgeland, South Carolina 29936

(843) 726-8136

**LAW OFFICE
R. THAYER RIVERS, JR.
COURTHOUSE SQUARE
252 RUSSELL STREET
POST OFFICE BOX 668
RIDGELAND, SOUTH CAROLINA 29936**

**R. THAYER RIVERS, JR.
ALSO ADMITTED IN GEORGIA**

**TELEPHONE
(843) 726-8136
FACSIMILE
(843) 726-4401**

October 17, 2016

RECEIVED

OCT 19 2016

Sean A. O'Connor, Esquire
Finkel Law Firm, LLC
4000 Faber Place Drive, Suite 400
North Charleston, SC 29405

George W. Cone, Esquire
McLeod Fraser & Cone, LLC
Post Office Box 230
Walterboro, SC 29488

SC Court of Appeals

Kathleen C. Barnes, Esquire
Barnes Law Firm, LLC
Post Office Box 897
Hampton, SC 29924

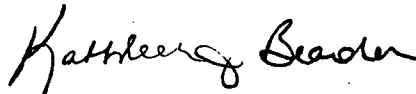
**RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPEAL - 2015-002049**

Dear Messrs O'Connor and Cone, and Ms. Barnes:

Enclosed herewith please find the Respondent Shuler's Final Brief and Respondent Shuler's Motion to File Final Brief Out of Time in the above matter.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure
cc: SC Court of Appeals

LAW OFFICE
R. THAYER RIVERS, JR.
COURTHOUSE SQUARE
252 RUSSELL STREET
POST OFFICE BOX 668
RIDGELAND, SOUTH CAROLINA 29936

R. THAYER RIVERS, JR.
ALSO ADMITTED IN GEORGIA

TELEPHONE
(843) 726-8136
FACSIMILE
(843) 726-4401

October 17, 2016 **RECEIVED**

OCT 19 2016

SC Court of Appeals

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

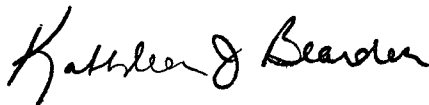
RE: MERS, INC. v. BANK OF WALTERBORO/SHULER
APPELLATE CASE NUMBER – 2015-002049

Dear Ms. Kitchings:

Enclosed herewith please find the original and seven (7) copies of the Respondent Shuler's Motion to File Final Brief Out of Time; the original, unbound, Final Brief of Respondent Shuler together with the required fifteen (15) copies of same; the original Proof of Service and Certificate of Counsel in the above matter.

Thank you and kindest regards.

Most sincerely,



Kathleen J. Bearden
Paralegal to R. Thayer Rivers, Jr.

:kjb
Enclosure

cc: Sean A. O'Connor, Esquire
George W. Cone, Esquire
Kathleen C. Barnes, Esquire