

THE STATE OF SOUTH CAROLINA

In The Supreme Court

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Case No. 2011-CP-07-0931

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Court of Appeals Case No.(2014-001296)

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National Bank of South Carolina,  
Respondent,

v.

Thaddesu F. Segars;KCS Investments,  
LLC; Singleton Place Homeowners  
Association, Inc., and Suntrust  
mortgage Inc., Defendants

Of Whom Thaddeus F. Segars is the

~~Appellant~~

*Petitioner.*

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MOTION TO FILE PETITION FOR CERTIORARI OUT OF TIME

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Appellant Thaddeus F. Segars moves the Honorable Court for an Order permitting the filing of his Petition for Ceriorari with the Court out of time based on the following particulars:

1. The Court of Appeals denied Appellants petition for rehearing by Order dated September 26, 2016. Appellant's counsel received a copy of the Order via U.S. mail on

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S.C. SUPREME COURT

October 1, 2016. Appellant calculates that the Appellant has to serve his Petition for Certiorari with the South Carolina Supreme Court by October 31, 2016 which he has done. However, if Appellant's counsel has miscalculated the time for filing, Appellant hereby requests that Appellant be permitted an additional fifteen days in which to serve his petition for Certiorari to the Supreme Court.

2. Appellant and Appellant's counsel both live and work on Hilton Head Island, South Carolina. On October 5, 2016 South Carolina Governor Niki Haley ordered the mandatory evacuation of Beaufort County among other areas. The evacuation order remained in effect for Hilton Head Island until the afternoon of October 12, 2016. Despite being allowed to return to Hilton Head citizens were without power and water for several more days. In addition, movement around the Island was restricted due to the many trees down and debris blocking roadways. Appellant's counsel's office was able to reopen on October 19, 2016. Should the Court determine that Appellant's petition is not timely filed, Appellant hereby requests an additional fifteen days in which to file and serve his Petition.

Respectfully Submitted,



Thomas J. Finn

Finn Law Firm

P.O. Box 6003

Hilton Head Island, S.C.

29938

Attorney for the Appellant

October 31, 2016  
Hilton Head Island, S.C. 29938

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

Marvin H. Dukes, III

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Case No.: 2009-CP-07-3201  
Appellate Case No.: 2014-001296

National Bank of SC..... Respondent,

v.

Thaddeus F. Segars; KCS Investments, LLC; Singleton  
Place Homeowners Association Inc.; and Suntrust  
Mortgage Inc.,..... Defendants,

Of Whom Thaddeus F. Segars is the ..... Appellant.

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CERTIFICATE OF SERVICE

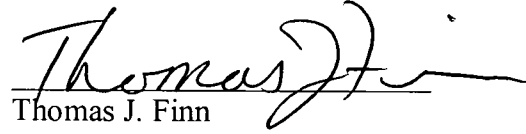
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I, Thomas J. Finn, do hereby certify that on October 31, 2016, I served a true and accurate copy of the Appellant's Motion to File Petitioner's Writ of Certiorari Out of Time in the above matter, by depositing a copy of the same in the U.S. Mail, first class postage prepaid, and addressed to:

Bryson M. Geer  
Nelson Mullins Riley &  
Scarborough, LLP  
151 Meeting St. Ste. 600  
Charleston, SC 29401-2239  
Phone (843)720-4306  
Fax (843)722-8700  
[Bryson.geer@nelsonmullins.com](mailto:Bryson.geer@nelsonmullins.com)

October 31, 2016

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Thomas J. Finn", written over a horizontal line.

Thomas J. Finn  
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29938  
(843) 682-3555