

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BARNWELL COUNTY  
Court of Common Pleas

J. Martin Harvey, Special Referee

Case No. 2015-CP-06-00070  
Appellate Case No. 2016-001214

RECEIVED  
NOV 28 2016  
SC Court of Appeals

Quicken Loans, Inc., ..... Appellant,

v.

Wayne D. Wilson; Calvin O. Wilson, III; Any other  
Heirs-at-law or Devisees of Ezekiel (Ellen) T. Wilson,  
Deceased, their heirs, Personal Representatives,  
Administrators, Successors and Assigns, and all other  
persons entitled to claim through them; all unknown  
persons with any right, title or interests in the real estate  
described herein; also any persons who may be in the  
military service of the United States of America, being  
a class designated as John Doe; and any unknown  
minors or persons under a disability being a class  
designated as Richard Roe; Park Sterling Bank, ..... Respondents.

APPELLANT'S MOTION FOR EXTENSION

Undersigned requests an additional three (3) days to file Appellant's initial reply  
brief. The current deadline is Monday, November 28, 2016. With the additional three (3) days,  
the new deadline will be Thursday, December 1, 2016. The additional time is requested due to  
the Thanksgiving holiday and travel during same. This is the second time this deadline has been  
extended but no further extensions will be necessary. Undersigned requests that the current  
deadline be held in abeyance pending consideration of this motion.

Counsel for Respondent consents to this request. The filing fee for this request is enclosed.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for Quicken Loans Inc.

Columbia, South Carolina

November 28, 2016

**Lisa Whitehurst**

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**Subject:** FW: Wilson v. Quicken Loans reply brief

**From:** "Charles L. Dibble DLO X230" <[cdibble@dibblelawofc.com](mailto:cdibble@dibblelawofc.com)>

**Date:** November 28, 2016 at 12:54:58 PM EST

**To:** 'Matt Bogan' <[Matt.Bogan@nelsonmullins.com](mailto:Matt.Bogan@nelsonmullins.com)>

**Subject:** RE: Wilson v. Quicken Loans reply brief

Matt –

This is to confirm that Respondent's counsel consent to your extension request (email below).

Best regards,  
Charles

---

Charles L. Dibble Telephone: 803.254.0307  
DIBBLE LAW OFFICES Fax (tollfree): 866.253.0458  
Post Office Drawer 1240  
Columbia, South Carolina 29202-1240 email: [cdibble@dibblelawofc.com](mailto:cdibble@dibblelawofc.com) (alternate: [dibblelaw@msn.com](mailto:dibblelaw@msn.com))

All mail should be sent to the post office drawer (above), omitting any street address.  
Courier deliveries (FedEx, UPS etc.) should be addressed to 914 Gregg Street, Columbia, SC 29201-3928.

Of Counsel to Belser & Belser P.A. [www.belserpa.com](http://www.belserpa.com)

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**From:** Matt Bogan [<mailto:Matt.Bogan@nelsonmullins.com>]

**Sent:** Monday, November 28, 2016 11:59

**To:** [cdibble@dibblelawofc.com](mailto:cdibble@dibblelawofc.com)

**Subject:** Wilson v. Quicken Loans reply brief

Hi Charles. I hope y'all had a nice Thanksgiving. Could I bother you for 3 more days on our reply brief? New deadline would be Thursday, December 1, 2016. With the holiday and travel to Chattanooga, I could use a couple of more days. I won't need any more beyond this one. Let me know if I can indicate your consent to the motion for the extra days. Thanks for your kind consideration on it. Matt

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Quicken Loans, Inc., .....

Appellant,

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Wayne D. Wilson; Calvin O. Wilson, III; Any other  
Heirs-at-law or Devises of Ezekiel (Ellen) T. Wilson,  
Deceased, their heirs, Personal Representatives,  
Administrators, Successors and Assigns, and all other  
persons entitled to claim through them; all unknown  
persons with any right, title or interests in the real estate  
described herein; also any persons who may be in the  
military service of the United States of America, being  
a class designated as John Doe; and any unknown  
minors or persons under a disability being a class  
designated as Richard Roe; Park Sterling Bank, .....

Respondents.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins  
Riley & Scarborough LLP, attorneys for Quicken Loans Inc., do hereby certify that I have  
served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing  
a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellant's Motion for Extension

Counsel Served:

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Lisa Whitehurst  
Administrative Assistant

November 28, 2016

# Nelson Mullins

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November 28, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia SC 29211

RE: Quicken Loans, Inc. v. Wayne D. Wilson, et al.  
Civil Action No. 2015-CP-06-00070  
Appellate Case No. 2016-001214  
Our File No. 42677/01510

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Dear Ms. Kitchings:

SC Court of Appeals

Enclosed please find the original and seven copies of Appellant's Motion for Extension in the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us via our courier. Also enclosed is our check in the amount of \$25.00 as the required filing fee.

Thank you for your consideration of this request.

Very truly yours,



A. Mattison Bogan

AMB:lpw  
Enclosure

cc: C. Bradley Hutto, Esquire  
Steven W. Hamm, Esquire  
Daniel W. Williams, Esquire  
Charles L. Dibble, Esquire  
Warren R. Herndon, Jr., Esquire