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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM Horry COUNTY  
Court of Common Pleas

DEC 06 2016

**SC Court of Appeals**

Cynthia Graham Howe, Master in Equity

Appellate Case No. 2016-002267

Wells Fargo Bank, N.A.....Respondent,

vs.

Daniel L. Belfield; Mortgage Electronic Registration Systems Inc., as nominee for  
Homecomings Financial Network, In.c (MIN# 100062604288914361); American  
Express Bank, F.S.B.....Defendants,

Of whom

Daniel L. Belfield is the.....Appellant.

**RESPONDENT'S MOTION FOR EXTENSION OF TIME**

Charles S. Gwynne Jr. (SC Bar # 73844)  
Rogers Townsend & Thomas, PC  
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1221 Main Street 14<sup>th</sup> Floor  
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charlie.gwynne@rtt-law.com  
Attorney for the Respondent

Rogers Townsend & Thomas, PC and its staff are debt collectors

December 6, 2016

Respondent Wells Fargo Bank, N.A. hereby moves for an extension of time to file and serve its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal due to counsel's heavy workload. The present deadline for service and filing of its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal is December 28, 2016.

Respondent's counsel requests a 30 day extension. Respondent's counsel believes that there is good cause to grant the requested extension to January 27, 2017.

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file its Initial Brief of Respondent and Respondent's Designation of Matter to Be Included in the Record on Appeal for an additional thirty days, to January 27, 2017.

Respectfully submitted,



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Charles S. Gwynne Jr. (SC Bar # 73844)

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Attorneys for Plaintiff

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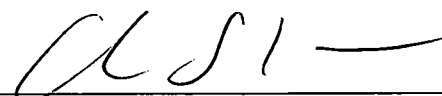
Daniel L. Belfield; Mortgage Electronic Registration Systems Inc., as nominee for Homecomings Financial Network, In.c (MIN# 100062604288914361); American Express Bank, F.S.B.....Defendants,

Of whom

Daniel L. Belfield is the.....Appellant.

**PROOF OF SERVICE**

I HEREBY CERTIFY that I have served the **RESPONDENT'S MOTION FOR EXTENSION OF TIME** on Appellant Daniel L. Belfield by depositing copies of it in the United States Mail, postage prepaid, on December 6, 2016, addressed to the parties of record shown on the attachment listing Other Counsel of Record and Parties.



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December 6, 2016

Other Counsel of Record and Parties:

Daniel L. Belfield  
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LICENSED IN SOUTH CAROLINA



December 6, 2016

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
The South Carolina Court of Appeals Clerk of Court  
1015 Sumter Street  
Columbia, South Carolina 29201

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**SC Court of Appeals**

RE: Wells Fargo Bank, N.A. v. Daniel L. Belfield; Mortgage Electronic Registration Systems Inc., as nominee for Homecomings Financial Network, In.c (MIN# 100062604288914361); American Express Bank, F.S.B  
Appellate Case # 2016-002267  
Our file # 513263.05369

Dear Ms. Kitchings:

Enclosed are the original and seven (7) copies of the Respondent's Motion for Extension of Time, along with a Proof of Service. Please return a filed copy of the document to me. Also included is my firm's check for \$25 representing the filing fee.

By copy of this letter, I am serving a copy of the Respondent's Motion for Extension of Time and Proof of Service on all parties to this appeal.

Thank you for your assistance in this matter.

With kind personal regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to be "C. Gwynne Jr.", written over a horizontal line.

Charles S. Gwynne Jr.

/ow  
Enclosures as stated

J

cc:

Daniel L. Belfield  
814 Finger Lake Drive  
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