

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Gordon G. Cooper, Master in Equity

Appellate Case No. 2015-002018  
Lower Court Case No. 2010-CP-42-04430

**RECEIVED**

JAN 30 2017

S.C. SUPREME COURT

Wells Fargo Bank, N.A.,  
successor-by-merger to  
Wachovia Bank, N.A.,

Respondent,

v.

Fallon Properties South  
Carolina, LLC, Timothy R.  
Fallon, Susan C. Fallon,  
Fallon Luminous Products  
Corporation, G. E. Business  
Capital Corporation, formerly  
Transamerica Business Capital  
Corporation, FSD Repurchase  
Solutions, LLC and South  
Carolina Department of  
Revenue,

Defendants,

Of Whom Fallon Properties  
South Carolina, LLC, Timothy  
R. Fallon, Susan C. Fallon are  
the,

Petitioners.

MOTION FOR EXTENSION

Petitioners' Reply Brief is currently due on January 30, 2017. The Respondent's Brief was served on January 19, 2017 but not received by counsel for Petitioners until January 23, 2017. Due to the Petitioners' counsel's other scheduled responsibilities and due to the already shortened time in

which to prepare, file and serve a Reply Brief, Petitioners request a five (5) day extension to file and serve the Reply Brief. With the granting of the extension the due date would for filing and service of the Reply brief would be February 6, 2017.

January 30, 2017



---

Alexander Hray, Jr.  
Bar Number: 2736  
389 E. Henry St., Suite 107  
Spartanburg, South Carolina 29302  
(864) 342-1111  
Fax: (864) 342-1113  
Attorney for Petitioners

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Gordon G. Cooper, Master in Equity

Appellate Case No. 2015-002018  
Lower Court Case No. 2010-CP-42-04430

**RECEIVED**

JAN 30 2017

S.C. SUPREME COURT

Wells Fargo Bank, N.A.,  
successor-by-merger to  
Wachovia Bank, N.A.,

Respondent,

v.

Fallon Properties South  
Carolina, LLC, Timothy R.  
Fallon, Susan C. Fallon,  
Fallon Luminous Products  
Corporation, G. E. Business  
Capital Corporation, formerly  
Transamerica Business Capital  
Corporation, FSD Repurchase  
Solutions, LLC and South  
Carolina Department of  
Revenue,

Defendants,

Of Whom Fallon Properties  
South Carolina, LLC, Timothy  
R. Fallon, Susan C. Fallon are  
the,

Petitioners.

PROOF OF SERVICE

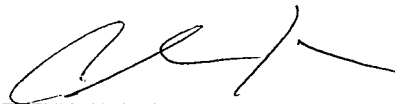
I certify that I have served the Petitioners' Motion for Extension via email and by depositing a copy thereof in the United States Mail, postage prepaid, on January 30, 2017, addressed to Respondent's attorneys of record, as follows:

(CONTINUED NEXT PAGE)

Robert L. Widener, Esq.  
McNair Law Firm, P.A.  
P. O. Box 11390  
Columbia, SC 29211  
[rwidener@mcnair.net](mailto:rwidener@mcnair.net)

Weyman C. Carter, Esq.  
McNair Law Firm, P.A.  
P.O. Box 447  
Greenville, SC 29602  
[wcarter@mcnair.net](mailto:wcarter@mcnair.net)

January 30, 2017



---

Alexander Hray, Jr.  
Bar Number: 2736  
389 E. Henry St., Suite 107  
Spartanburg, South Carolina 29302  
(864) 342-1111  
Fax: (864) 342-1113  
Attorney for Petitioners

ALEXANDER HRAY, JR.  
ATTORNEY AT LAW  
389 EAST HENRY STREET, SUITE 107  
SPARTANBURG, SC 29302  
Phone: (864) 342-1111 FAX: (864) 342-1113  
E-mail: lexhray@bellsouth.net

Via Hand Delivery

January 30, 2017

RECEIVED

JAN 30 2017

The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

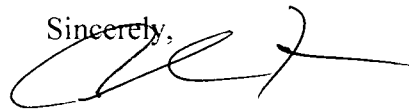
S.C. SUPREME COURT

RE: Wells Fargo Bank, N.A. *etc.* v. Fallon Properties South Carolina, LLC, *et al.*; Case No. 2010-CP-42-4430; Appellate Case No. 2015-002018

Dear Mr. Shearouse:

The Petitioners' Reply Brief in the referenced matter is due today January 30, 2017. The Brief of Respondent was served on Petitioners on January 19, 2017 but it was not delivered in the mail to counsel for Petitioners until January 23, 2017. Due to the Petitioners' counsel's other scheduled responsibilities and due to the already shortened time in which to prepare, file and serve a Reply Brief, Petitioners request a five (5) day extension to file and serve their Reply brief. With the granting of the extension the due date for filing and service would be February 6, 2016. No prior extension requests have been made by Petitioners in this appeal. My check in the sum of \$25.00 for the motion filing fee is enclosed. Thank you for extending this courtesy to me.

Sincerely,



Alexander Hray, Jr.  
389 E. Henry St., Suite 107  
Spartanburg, South Carolina 29302  
(864) 342-1111  
Fax: (864) 342-1113  
Attorney for Appellants

Enclosures as noted

cc: Weyman C. Carter, Esq., Attorney for Respondent, via email and US mail  
Robert L. Widener, Esq., Attorney for Respondent, via email and US mail  
Rodney F. Pillsbury, Esq., Appellants' Trial Attorney, via email only



# The Supreme Court of South Carolina

Alexander Hray, Jr.  
389 E. Henry St., Ste 107  
Spartanburg SC 29302

01/30/2017

## RECEIPT #82335

<b>Case No:</b>	2015-002018
<b>Case Short Title:</b>	Wells Fargo Bank, N.A. v. Fallon Properties, SC, LLC
<b>Event:</b>	Motion - Extension of Time (1st)
<b>Fee Type:</b>	Motion Fee
<b>Amount:</b>	\$25.00
<b>Payment Type:</b>	Check
<b>Reference No:</b>	8932
<b>Check/Money Order Date:</b>	01/30/2017
<b>Comments:</b>	