

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Honorable G. Thomas Cooper, Jr., Circuit Court Judge

Case No: 2016-002041

RECEIVED

FEB 17 2017

SC Court of Appeals

82545

U.S. Bank National Association, as Trustee for Citigroup Mortgage Loan Trust, Inc.,
Mortgage Pass-Through Certificates, Series 2006-WF2,.....Respondent

v.

Charles T. Brooks, III; Irma R. Brooks; Woodcreek Farms Homeowners Association;
Community Resource Bank N.A.; Robinson Equipment Company, A Limited Partnership;
South Carolina Department of Revenue; and the United States of America acting by and
through its agency the Internal Revenue Service, Defendants,

Of Which Charles T. Brooks, III and Irma R. Brooks,Appellants

MOTION TO REQUEST EXTENSION

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 30-day extension of time to file the Appellant's Return to the Respondent's Motion to Dismiss. This request is made as a result that the Appellant's Counsel having several cases with pleadings due before the Court of Appeals and South Carolina Supreme Court within the ten (10) days required to file a proper Return to the Motion herein which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation.

For the reason set forth herein, counsel for the Appellant submits that good cause has been shown why the time limits prescribed by the Rules should be changed and the Appellant be given an additional thirty (30) day period with which to file any objections and/or Return to the Motion to Dismiss.

Respectfully Submitted,



Irma R. Brooks /Bar ID#8507

309 Broad Street

Post Office Box 3512

Sumter, SC 29151

(803) 418-5708

Sumter, SC
February 16, 2017

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Partnership; South Carolina Department of Revenue; and the United States of America
acting by and through its agency the Internal Revenue Service, Defendants,

Of Which Charles T. Brooks, III and Irma R. Brooks,Appellants


PROOF OF SERVICE

I, the undersigned, do hereby certify that on this February 16, 2017, I served the
foregoing **Motion for Extension** as well as **Proof of Service** in this matter by depositing
a true copy of it in the United States Mail, postage prepaid, on February 16, 2017,
addressed to the following as indicated below:

Magalie A. Creech
Post Office Box 41489
Charleston, South Carolina 29423

Thomas A. Shook
Post Office Box 71727
North Charleston, South Carolina 29415

Dated: February 16, 2017



Irma R. Brooks
Attorney for the Appellant
309 Broad Street
Sumter, South Carolina 29150
(803) 418-5708

The Brooks Law Office, LLC

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South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

RE: US Bank vs Brooks
2016-002041

Dear Ms. Kitchings:

Please find enclosed herewith the original and six (6) copies of the Motion for Extension with reference to the above matter, which I hereby submit for filing at this time. In addition, I have enclosed the required fee for the filing of this Motion with the Courts.

Please return any unused copies to my attention in the provided self-addressed stamped envelope.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Irma R. Brooks

IRB/jlm

cc: Magalie A. Creech
Thomas A. Shook

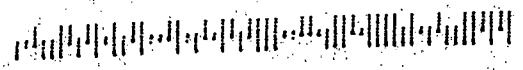




COLUMBIA SC 292

FRI 17 FEB 2017 AM

The Brooks Law Offices, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29150



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Jenny Abbott Kitchings
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