

In The Supreme Court

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ON CERTIORARI TO THE COURT OF APPEALS
APPEAL FROM KERSHAW COUNTY
Court of Common Pleas
George C. James, Jr., Circuit Judge

MAY 17 2017

S.C. SUPREME COURT

Appellate Case No. 2015-001554
Common Pleas Case No. 2010-CP-28-1197

U.S. Bank National Association Successor trustee to LaSalle Bank National Association, as trustee under the Pooling and Servicing Agreement, dated as of April 1, 2002, among Asset Backed Funding Corporation, Litton Loan Servicing LP and LaSalle Bank National Association, ABFC Asset Backed Certificates, Series 2002-SB-1,.....Respondent,

v.

Kelley Burr; FIA Card Services, N.A.; Discovery Bank, Issuer of the Discover Card; Unifund CCR Partners; Defendants,

Of Whom Kelley Burr is the.....Petitioner.

MOTION FOR EXTENSTION OF TIME TO SERVE AND FILE REPLY BRIEF

Andrew S. Radeker
S.C. Bar No. 73743
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Petitioner

Petitioner hereby moves pursuant to Rule 263(b), SCACR, for to May 30, 2017 (the next working day after 10 days from the current deadline) of the time in which to serve and file Petitioner's reply brief in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The deadline for service and filing of Petitioner's reply brief is currently May 18, 2017.
2. This is the first extension of this deadline that Petitioner has sought.
3. The undersigned counsel has a number of other writing deadlines and court appearances in the upcoming days, as well as a reply brief in another appeal due on May 25, 2017, and he could use some additional time to draft the reply brief.
4. As shown by the attached email message, opposing counsel consents to the requested extension.
5. Petitioner's counsel believes there is good cause to grant the requested extension to May 30, 2017.

WHEREFORE Petitioner prays for an order extending the time in which to serve and file Petitioner's reply brief to May 30, 2017.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. S. Radeker', written over a horizontal line.

Andrew S. Radeker
S.C. Bar No. 73743
Harrison & Radeker, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Petitioner

May 17, 2017

Drew Radeker

From: Sullivan, Tara Cloer <Tara.Sullivan@klgates.com>
Sent: Tuesday, May 16, 2017 9:25 AM
To: Drew Radeker
Cc: Thiem, Jennifer H.
Subject: RE: US Bank v. Burr

Hi, Drew,

Yes, we consent to an extension through May 30th.

Best regards,
Tara



Tara C. Sullivan
K&L Gates LLP
134 Meeting Street, Suite 500
Charleston, SC 29401
Phone: (843) 579-5679
Fax: (843) 579-5601
tara.sullivan@klgates.com
www.klgates.com

From: Drew Radeker [mailto:Drew@harrisonfirm.com]
Sent: Monday, May 15, 2017 8:05 AM
To: Sullivan, Tara Cloer
Subject: US Bank v. Burr

Tara, I hope you are well. Would you mind consenting to an extension through May 30 of the deadline for our reply brief? As usual, I have a million things going on and could use the extra time.

Thank you.

Drew Radeker

HARRISON & RADEKER, P.A.

ATTORNEYS AT LAW

*Real Estate / Property Disputes · Foreclosure · Media Law · Zoning · Criminal Defense · Appeals
Personal Injury · Consumer Law · Mediation/Arbitration · False Arrest · Commercial Litigation*

923 Calhoun Street, Columbia, South Carolina 29201
Post Office Box 50143, Columbia, South Carolina 29250
Telephone: (803) 779-2211
Facsimile: (803) 779-6700

[http://secure-web.cisco.com/17d68dbODtOeci1Btcca2eAJoBpmNVbyIWBuobGc6j1OBPLNtp8jXuBY-AvW-2GspbhJq-stlwxpuG1YUECNKGmRiIsmdz_AVh4Vto1BmkCRAo0RGB-ie5prQsN7MEEyRqzsd-bXmtlJrYyeg4PG3ec87L701YpOdVaLhJFDlfBsqZFwBNUlu13DG_9dLtgZ9FRubPosbzxXu_RSQv5o3-](http://secure-web.cisco.com/17d68dbODtOeci1Btcca2eAJoBpmNVbyIWBuobGc6j1OBPLNtp8jXuBY-AvW-2GspbhJq-stlwxpuG1YUECNKGmRiIsmdz_AVh4Vto1BmkCRAo0RGB-ie5prQsN7MEEyRqzsd-bXmtlJrYyeg4PG3ec87L701YpOdVaLhJFDlfBsqZFwBNUlu13DG_9dLtgZ9FRubPosbzxXu_RSQv5o3-AgCPfzEYK6FksR_SiwynA4IPEahdxmSMtlyhS_Tga_7KCA_govilQRw3AvGOs-oSp7GXVcQO4ccbtZmqH72Ap8/http%3A%2F%2Fwww.harrisonfirm.com%2F)

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THE STATE OF SOUTH CAROLINA
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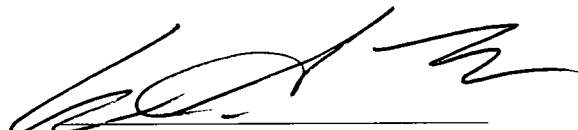
Of Whom Kelley Burr is the.....Petitioner.

PROOF OF SERVICE

I certify that I served the foregoing motion for extension in this case by
depositing a copy of it on the date shown below in the United States Mail, postage
prepaid, addressed as follows:

Jennifer H. Thiem, Esq.
Tara C. Sullivan, Esq.
K&L Gates LLP
134 Meeting St.
Charleston, SC 29401

May 17, 2017



Andrew S. Radeker