

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

Honorable Steven C. Kirven, Master-In-Equity

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MAY 26 2017

Case No. 2011-CP-37-1056

SC Court of Appeals

Appellate Case No. 2017-000886

Federal National Mortgage Association.....RESPONDENT

v.

John D. Dalen, Julie A. Dalen and Wawtockace Hills Property Owners  
Association,.....DEFENDANTS

Of whom John D. Dalen and Julie A. Dalen are.....APPELLANTS

v.

Bank of America, N.A., successor by merger to BAC Home Loans Servicing, L.P. f/k/a  
Countrywide Home Loans Servicing, L.P.....RESPONDENT

**RESPONDENT BANK OF AMERICA, N.A.'S  
MOTION TO EXTEND TIME TO FILE INITIAL BRIEF AND  
DESIGNATE MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 263, SCACR, the undersigned counsel for Respondent Bank of America, N.A. ("Bank of America") hereby moves for an extension of time to file its Initial Brief and Designation of Matters to be Included in the Record on Appeal.

The grounds for this motion are that Bank of America's attorneys require additional time to procure copies of relevant transcripts and other court records in order to investigate



and respond to Appellant's arguments. Accordingly, Bank of America's counsel needs thirty-two (32) additional days to file the Initial Brief and Designation of Matters to be Included in the Record on Appeal. To this end, Bank of America requests an extension of time up to and including July 17, 2017 to file and serve its Initial Brief and Designation of Matters to be Included in the Record on Appeal.

WHEREFORE, for good cause shown, Bank of America prays that the Court issue an order that extends its deadline to file an Initial Brief and designate matters to be included in the record on appeal from June 15, 2017 to July 17, 2017.

Respectfully submitted, this 25th day of May, 2017.



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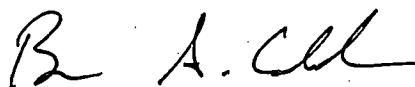
*Attorney for Respondent Bank of America,  
N.A., successor by merger to BAC Home  
Loans Servicing, L.P. f/k/a Countrywide  
Home Loans Servicing, L.P*

**CERTIFICATE OF SERVICE**

The undersigned attorney for Respondent Bank of America, N.A. certifies that its *Motion to Extend Time to File Initial Brief and Designate Matters to be Included in the Record on Appeal* was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid, on May 25, 2017, to the following:

John D. Dalen and Julie A. Dalen  
109 Wood Valley Drive  
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*Pro Per Appellants*

Charles S. Gwynne, Jr.  
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SC Court of Appeals

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May 25, 2017

**VIA FEDERAL EXPRESS**  
**TRACKING NO. 7866 8867 4431**

Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, SC 29201

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MAY 26 2017

**SC Court of Appeals**

**RE: *Federal National Mortgage Association v. John D. Dalen, et al.***  
**Court of Appeals No. 2017-000886**  
**Court of Common Pleas No. 2011-CP-37-001056**

Dear Ms. Kitchings:

Enclosed for filing are the *Notice of Appearance*, and the original and six copies of *Respondent's Motion to Extend Time to File Initial Brief and Designation of Matter to be Included in the Record on Appeal*, along with our check in the amount of \$25.00 for the filing fee. Please file the documents, and return file-stamped copies to me in the self-addressed, stamped envelope also included.

Thank you for your attention to this matter. If you have any questions, please contact our office.

Sincerely,

MCGUIREWOODS LLP



Cindy J. Smith  
Practice Assistant to Brian A. Calub

/cjs  
Enclosures

cc: John D. Dalen & Julie A. Dalen, *Pro Se* (w/encl.)  
Charles S. Gwynne, Jr. (w/encl.)

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TO JENNY ABBOTT KITCHINGS  
COURT OF APPEALS CLERK OF COURT  
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COLUMBIA SC 29201

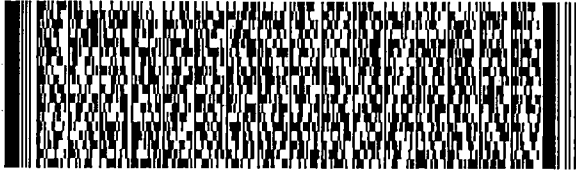
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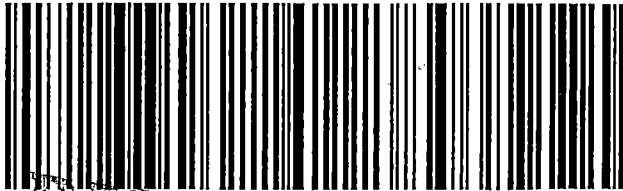


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SC Court of Appe

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