

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEE COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Appellate Case No. 2016-001989

Laura Toney,

Appellant,

v.

LaSalle Bank National Association, as Trustee
For the Registered Holder of Structured Assets
Securities Corporation, Structured Asset
Investment Loan Trust, Mortgage Pass-
Through Certificates, Series 2004-11, A/K/A
Altisource Homes, Wayne Capell, Lee County
Treasurer and Lee County Planning and Zoning,

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SC Court of Appeals

Respondents.

**RESPONDENTS WAYNE CAPELL, LEE COUNTY TREASURER AND LEE COUNTY
PLANNING AND ZONING'S MOTION TO JOIN LASALLE BANK NATIONAL
ASSOCIATION'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE
RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER**

Paul M. Fata (SC Bar 001966)
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*Attorneys for Respondents Wayne Capell,
Lee County Treasurer and Lee County
Planning and Zoning*

Laura Toney
Post Office Box 722
Bishopville, South Carolina 29010
Appellant Pro Se

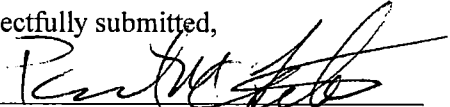
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Laura Toney v. LaSalle Bank National Association, et al.
Appellant Case No. 2016-001989

RESPONDENT'S WAYNE CAPELL, LEE COUNTY TREASURER AND LEE COUNTY PLANNING AND ZONING'S MOTION TO JOIN LASALLE BANK NATIONAL ASSOCIATION'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE RESPONDENTS' INITIAL BRIEF AND DESIGNATION OF MATTER

NOW COMES Respondent Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning, who, by and through their undersigned counsel, respectfully moves before the Court to join Respondent LaSalle Bank National Association's Motion for an extension of time in which to serve *Respondents' Initial Brief and Designation of Matter* upon the Appellant and co-Respondents and file same along with the accompanying *Proof of Service* with the Court. *Respondents' Initial Brief and Designation of Matter* is due to be served on all Parties and filed with the Court on or before June 16, 2017. Respondents Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning joins with Respondent LaSalle Bank to move for the due date to be extended to Monday, July 17, 2017. The basis for this Motion is that Respondents' attorney needs additional time to complete the Initial Brief and Designation of Matter. Respondents Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning respectfully submits that neither *pro se* Appellant nor Co-Respondents would be prejudiced by the Court's granting this motion.

Respectfully submitted,

By: 
PAUL M. FATA (SC Bar 001966)
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*Attorneys for Respondent Wayne Capell,
Lee County Treasurer and Lee County
Planning and Zoning*

June 13, 2017

Opposing Party

Laura Toney
Post Office Box 722
Bishopville, South Carolina 29010
Appellant Pro Se

Co-Respondents' Counsel

Sean A. O'Connor, Esq.
Finkel Law Firm, LLC
4000 Faber Place Drive, Suite 450
North Charleston, South Carolina 29405

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PROOF OF SERVICE

I hereby certify that on this, the 13th day of June, 2017, a copy of Respondents Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning's *Motion to Join Respondent's LaSalle Bank National Motion for Extension of Time to Serve and File Respondents' Initial Brief and Designation of Matter* was served upon all interested Parties to the Appeal by mailing a copy of same with sufficient first class postage affixed thereto, addressed as follows:

Laura Toney
Post Office Box 722
Bishopville, South Carolina 29010
Appellant Pro Se

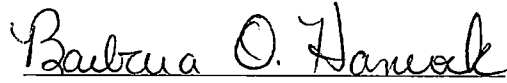
Sean A. O'Connor
Finkel Law Firm, LLC
4000 Faber Place Drive, Suite 450
North Charleston, South Carolina 29405

(SIGNATURE ON FOLLOWING PAGE)

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Appellant Case No. 2016-001989

**RESPONDENTS WAYN CAPELL, LEE COUNTY TREASURER AND LEE COUNTY PLANNING AND ZOING'S MOTION TO JOIN
LASALLE BANK NATIONAL ASSOCIATION'S MOTION FOR EXTENSION OF TIME TO SERVE AND FILE RESPONDENTS' INITIAL
BRIEF AND DESIGNATION OF MATTER**



Barbara O. Hancock

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(1924-1995)

(803) 484-5409
Fax: (803) 484-9239

June 13, 2017

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

RE: Laura Toney vs. LaSalle Bank National Association, et al
Appellate Case No.: 2016-001989
Case No: 2013-CP—31-00321
Our File No.: 52310.44666

Dear Ms. Kitchings:

Please find enclosed herewith the original and six (6) copies of Respondent Wayne Capell, Lee County Treasurer and Lee County Planning and Zoning's Motion to Join LaSalle Bank National Association's Motion for Extension of Time to Serve and File Respondents' Initial Brief and Designation of Mattering and Proof of Service regarding the above captioned matter.

I am also enclosing herewith my check in the amount of \$25.00 representing the filing fee for same. Please return the filed copies to my office in the enclosed stamped envelope.

By copy of this letter, including enclosures, all interested Parties are being served with same.

If you have any questions, please do not hesitate to contact me.

Thank you for your assistance with this matter.

With kind regards, I remain,

Yours very truly,

STUCKEY, FATA & SEGARS, LLC


PAUL M. FATA

PMF:boh

Enclosures

Cc: Ms. Laura Toney, pro se Appellant (w/encl.)
Sean A. O'Connor, Esq. (w/encl.)

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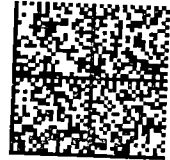
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