

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

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JUL 03 2017

SC Court of Appeals

Laura Toney,

Appellant,

v.

LaSalle Bank National Association as Trustee for the
Registered Holder of Structured Asset 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,

Respondents.

**RESPONDENT LASALLE BANK'S MOTION FOR EXTENSION OF TIME
TO SERVE AND FILE RESONDENTS' INITIAL BRIEF
AND DESIGNATION OF MATTER**

Sean A. O'Connor (SC Bar 68382)
FINKEL LAW FIRM LLC
4000 Faber Place Drive | Suite 450
North Charleston, South Carolina 29405
Telephone: 843.577.5460
Attorneys for Respondent LaSalle Bank

Laura Toney
P.O. Box 722
Bishopville, SC 29010
Appellant Pro Se



NOW COMES Respondent LaSalle Bank National Association as Trustee for the Registered Holder of Structured Asset Securities Corporation, Structured Asset Investment Loan Trust, Mortgage Pass-Through Certificates, Series 2004-11, A/K/A Altisource Homes ("LaSalle Bank"), who, by and through its undersigned counsel, respectfully moves before the Court for an extension of time in which to serve *Respondents' Initial Brief and Designation of Matter* upon 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 July 17, 2017. Respondent LaSalle Bank moves for the due date to be extended to Wednesday, August 16, 2017. The basis for this Motion is that due to the lengthy procedural history of this litigation and large volume of filings and proceedings by Appellant in several different courts, the process of fact and document review in connection with preparing of Respondent's Initial Brief requires additional time. Respondent LaSalle Bank respectfully submits that neither *pro se* Appellant nor Co-Respondent would be prejudiced by the Court's granting this motion.

Respectfully submitted,



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Attorneys for Respondent LaSalle Bank

June 30, 2017

Opposing Party

Laura Toney
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Bishopville, SC 29010
Appellant Pro Se

Co-Respondent's Counsel

Paul M. Fata, Esq.
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Treasurer and Lee County Planning and Zoning,

Respondents.

PROOF OF SERVICE

I hereby certify that on this, the 30th day of June, 2017, a copy of *Respondent LaSalle Bank's 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
P.O. Box 722
Bishopville, SC 29010

Paul M. Fata, Esq.
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Bishopville, SC 29010

[SIGNATURE ON FOLLOWING PAGE]

Laura Toney v. LaSalle Bank National Association, et al.
Appellate Case No.: 2016-0001989
PROOF OF SERVICE- Motion For Extension of Time to
Serve and File Respondent's Initial Brief and Designation of Matter



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REPLY TO:
CHARLESTON LITIGATION

June 30, 2017

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

Re: *Toney v. LaSalle Bank, et al.*
Appellate Case No. 2016-001989
Case No.: 2013-CP-31-00321
Our File No.: 52310.44666

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing, please find the following documents:

- (1) *Respondent LaSalle Bank's Motion for Extension of Time to File and Serve Respondents' Initial Brief and Designation of Matter*; and
- (2) the accompanying *Proof of Service*.

I have included the original and six (6) copies of each, Finkel Law Firm check number 64468 in the amount of \$25 for the filing fee, and a prepaid, self-addressed envelope so that filed copies may be returned to our office. By copy of this correspondence, including enclosures, all interested Parties are being served with same

If you have any questions or concerns, please contact me at your convenience.

With warmest regards, I am

Yours very truly,



Malena A. Dinwoodie
Litigation Paralegal

/mad

cc: Laura Toney, *pro se* Appellant (w/encl.)
Paul M. Fata, Esq. (w/encl.)

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SC Court of Appeals

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