

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Steven C. Kirven, Master-in-Equity

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 the 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

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AUG 09 2017

SC Court of Appeals

APPELLANTS JOHN AND JULIE DALEN'S MOTION FOR EXTENSION OF TIME

Appellants, John and Julie Dalen hereby move for an extension of time to file and serve their Record on Appeal due to the fact that the respondents' Designation of Matter to be Included is voluminous and contains items that Appellants will need to locate and/or order (Transcripts) not already in their possession.

The present deadline for serving the Record on Appeal is August 16, 2017. Appellants request a sixty day extension. Appellants believe there is good cause to grant the extension to Monday, October 16, 2017. Appellants had an attorney for approximately two years, and they may need to obtain documents from his files.




Attorneys for respondents Bank of America, N.A. and FNMA have consented to this 60-day extension.

WHEREFORE, appellants John and Julie Dalen move for an order extending the time in which to serve and file the Record on Appeal to Monday, October 16, 2017.

Respectfully submitted,

August 11, 2017

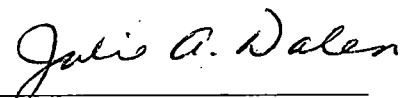
John D. Dalen and Julie A. Dalen



John D. Dalen

Appearing Pro Per / Appellant(s)
109 Wood Valley Drive
Westminster, SC 29693
Ph. 864.647.4705

Email: johndalen@gmail.com



Julie A. Dalen



John Dalen <johndalen@gmail.com>

Extension

Calub, Brian A. <BCalub@mcguirewoods.com>

Mon, Aug 7, 2017 at 12:56 PM

To: John Dalen <johndalen@gmail.com>, Charlie Gwynne <CHARLIE.GWYNNE@rtt-law.com>

Cc: "Smith, Cindy J." <CSmith@mcguirewoods.com>, "Garrett, Edward S." <EGarrett@mcguirewoods.com>

John and Julie:

On behalf of my client, Bank of America, N.A., I consent to your request for an additional 60-days to assemble the Record on Appeal.

Brian A. Calub

T: +1 704 343 2009

From: John Dalen [mailto:johndalen@gmail.com]**Sent:** Monday, August 07, 2017 12:54 PM**To:** Calub, Brian A. <BCalub@mcguirewoods.com>; Charlie Gwynne <CHARLIE.GWYNNE@rtt-law.com>**Subject:** Extension

Hi Brian and Charlie,

Thank you, Brian for taking the time to speak with me earlier today, and for agreeing to a 60-day extension on filing our Record on Appeal...we're working on that motion right now. The extension would run to Monday, October, 16th. We will, however, file the Record on Appeal as soon as it is complete, which we expect will be well before the requested extension deadline. If you both agree, we would appreciate an acknowledgment email. Thanks, John Dalen (case 2017-000886)

This e-mail from McGuireWoods may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading or forwarding to others.



John Dalen <johndalen@gmail.com>

Extension

Charlie Gwynne <CHARLIE.GWYNNE@rtt-law.com>

Mon, Aug 7, 2017 at 12:58 PM

To: "Calub, Brian A." <BCalub@mcguirewoods.com>, John Dalen <johndalen@gmail.com>

Cc: "Smith, Cindy J." <CSmith@mcguirewoods.com>, "Garrett, Edward S." <EGarrett@mcguirewoods.com>

I consent also.

Charlie



ROGERS TOWNSEND
ATTORNEYS AT LAW

Charlie Gwynne
Shareholder

Direct 803.744.1933
Fax 803.343.7017

Rogers Townsend & Thomas, PC
1221 Main Street 14th Floor · Columbia, SC 29201
P.O. Box 100200 · Columbia, SC 29202

Main 803.771.7900
Visit rtt-law.com

From: Calub, Brian A. [mailto:BCalub@mcguirewoods.com]

Sent: Monday, August 07, 2017 12:57 PM

To: John Dalen; Charlie Gwynne

Cc: Smith, Cindy J.; Garrett, Edward S.

Subject: RE: Extension

[Quoted text hidden]

NOTICES

PRIVILEGED AND CONFIDENTIAL: This electronic message (including any attachments) is intended only for the use of the individual or entity to which it is addressed and may contain information that is attorney-client privileged, may be confidential work product, or may be exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is wrongful, is strictly prohibited, and may subject you to civil liability. If you have received this communication in error, please immediately notify us by telephone at 803-771-7900 (Columbia office) or 704-442-9500 (Charlotte office) or by return e-mail, and destroy any copies (electronic, paper, or otherwise) that you may have of this communication.

DEBT COLLECTOR: This firm collects debts for mortgage lenders and other creditors. Any information obtained will be used for that purpose. However, if you have previously received a discharge in bankruptcy, this message is not and should not be construed as an attempt to collect a debt, but only as an attempt to enforce a lien.



John Dalen <johndalen@gmail.com>

Extension

John Dalen <johndalen@gmail.com>
To: Charlie Gwynne <CHARLIE.GWYNNE@rtt-law.com>

Mon, Aug 7, 2017 at 1:22 PM

Thank you, Charlie!
[Quoted text hidden]

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

Steven C. Kirven, Master-in-Equity

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 the Appellants

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Bank of America, N.A., Successor by merger to

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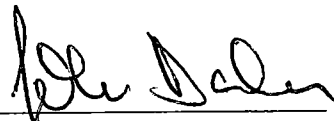
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SC Court of Appeals

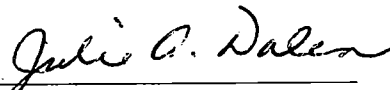
PROOF OF SERVICE

I certify that we have served Appellants John and Julie Dalen's Motion for Extension of Time on Respondents Bank of America, N.A. and FNMA by depositing copies of it in the United States mail, postage pre-paid on August 7, 2017, sent to the attorneys of record to the addresses shown on the attachment listing other parties and counsel of record.

August 7, 2017



John D. Dalen



Julie A. Dalen

John D. Dalen and Julie A. Dalen

Appearing Pro Per / Appellant(s)

109 Wood Valley Drive

Westminster, SC 29693

Ph. 864.647.4705

Other parties and counsel of record:

Attorney for Respondent Bank of America, N.A.

Brian A. Calub, Esq.
McGuire Woods LLP
Fifth Third Center
201 North Tryon St., Ste. 3000
Charlotte, NC 28202
Ph. 704.343.2000

Attorney for Respondent FNMA

Charles S. Gwynne, Jr., Esq.
Rogers, Townsend & Thomas, PC
P.O. Box 100200
Columbia, SC 29202
Ph. 803.744.1933

John and Julie Dalen

109 Wood Valley Drive
Westminster, SC 29693

April 7, 2017

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

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SC Court of Appeals

Re: 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 the 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

Case: 2017 - 000886

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of Appellants John and Julie Dalen's Motion for Extension of Time and Proof of Service. Please return a filed copy of the document in the self-addressed, stamped envelope provided. Also included is our check for the \$25 filing fee and copies of emails from respondents, consenting to the extension.

Thank you for your assistance in this matter.

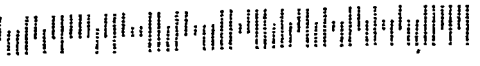
Sincerely,



John Dalen

/jd

Enc. As stated



minster, SC 29675



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The Hon. Jenny Abbott Kitchings, Clerk
South Carolina
Court of Appeals
1220 Senate Street
Columbia, SC 29201
Post Office Box 11629
Columbia, SC 29211

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SC Court of Appeals