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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

Thomas A. Russo, Circuit Court Judge

Case No. 2014-CP-21-00916

Beneficial Financial I Inc., successor by merger to
Beneficial Mortgage Co. of South Carolina, Appellant

v.

Jon Windham, a/k/a Jon D. Windham; Frances Windham, a/k/a
Frances C. Windham; and Jerry Coker, a/k/a Jerry L. Coker;
Carolina Bank & Trust Co.; The United States of America, by and
through its agency, the Internal Revenue Service; and
The Citizens Bank, Defendants,

Of Whom Jon Windham a/k/a Jon D. Windham is the Respondent

Appellate Case No. 2017-001954

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SC Court of Appeals

APPELLANT’S MOTION FOR EXTENSION OF TIME

HERE COMES Appellant Beneficial Financial I Inc., successor by merger to Beneficial Mortgage Co. of South Carolina (“Beneficial”), by and through undersigned counsel and pursuant to Rule 263 of the South Carolina Appellate Court Rules, and hereby moves this Court for an Order for an Order granting an extension of thirty (30) days, or through and including February 7, 2018, within which to file and serve Appellant’s Initial Brief and Designation of Matter on Appeal.

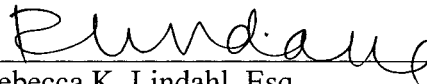


In support of this Motion, Appellant respectfully shows this Court that the transcript of the Circuit Court proceeding was received by undersigned counsel on December 7, 2017. By operation of Rule 208(a)(1), Appellant's Initial Brief and Designation of Matter on Appeal is currently due on or before January 8, 2018. This Motion is not intended for purposes of delay, but in order to properly research and prepare Appellant's brief.

WHEREFORE, Appellant respectfully requests an additional thirty (30) days, or through and including Wednesday, February 7, 2018, within which to file and serve its Initial Brief and Designation of Matter on Appeal.

This the 5 day of January, 2018.

Respectfully submitted,



Rebecca K. Lindahl, Esq.
Katten Muchin Rosenman LLP
550 S. Tryon Street, Suite 2900
Charlotte, NC 28202
(704) 344-3141
Attorney for Appellant

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Of Whom Jon Windham a/k/a Jon D. Windham is the Respondent

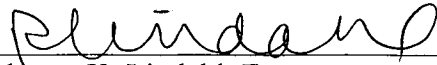
Appellate Case No. 2017-001954

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time on counsel for
the Respondent by depositing a copy in the United States Mail, postage prepaid, on January
3, 2018, addressed to the following:

Penny Hays Cauley, Esq.
Hays Cauley, P.C.
1303 W. Evans Street
Florence, SC 29501

January 3, 2018.



Rebecca K. Lindahl, Esq.
Katten Muchin Rosenman LLP
550 S. Tryon Street, Suite 2900
Charlotte, NC 28202
(704) 344-3141
Attorney for Appellant

January 3, 2018

Via Federal Express

Ms. Jenny Abbott Kitchings
Clerk of Court- SC Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

**Re: Beneficial Financial I Inc., successor by merger to
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v.

**Jon Windham, a/k/a Jon D. Windham; Frances Windham, a/k/a
Frances C. Windham; and Jerry Coker, a/k/a Jerry L. Coker;
Carolina Bank & Trust Co.; The United States of America, by and
through its agency, the Internal Revenue Service; and
The Citizens Bank, Defendants,**

Of Whom Jon Windham a/k/a Jon D. Windham is the Respondent

Appellate Case No. 2017-001954

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time to File Initial Brief and Designation of Matter on Appeal, along with six copies in accordance with Rule 240(d), with a copy to counsel for the Respondent. Our firm's check for the filing fee is enclosed as well.

Thank you for your consideration.

Sincerely,



Sara K. Brown
Paralegal

Ms. Jenny Abbott Kitchings
January 3, 2018
Page 2

SKB:
Enclosure

cc: Penny Hays Cauley

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TO **JENNY ABBOTT KITCHINGS**
CLERK OF COURT- SC COURT OF APPEALS
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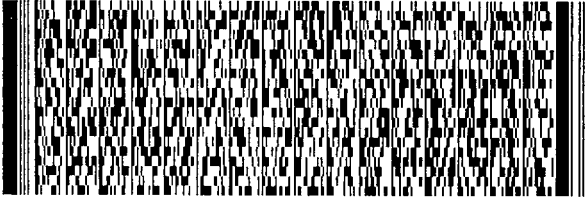
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