

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

FEB 16 2018

The Honorable R. Markley Dennis, Jr.  
Circuit Court Judge

**SC Court of Appeals**

Case No. 2013-CP-10-05329  
Appellate Case No. 2016-000028

JPMorgan Chase Bank, National Association, ..... Appellant,

v.

Delilah Starr Acheson a/k/a Delilah S. Acheson a/k/a  
Starr D. Acheson, individually, as Legal Heir and  
Personal Representative of the Estate of Joseph L.  
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,  
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,  
Jacob Lee Acheson, and Daniel Alexander Acheson, as  
Legal Heirs or Devisees of the Estate of Joseph L.  
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,  
Ronald Lee Dowell, Ruth C. Dowell, and Charleston  
County Revenue Collections, .....

Defendants.

Of whom Delilah Starr Acheson a/k/a Delilah S.  
Acheson a/k/a Starr D. Acheson, individually, as Legal  
Heir and Personal Representative of the Estate of Joseph  
L. Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,  
Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,  
Jacob Lee Acheson, and Daniel Alexander Acheson, as  
Legal Heirs or Devisees of the Estate of Joseph L.  
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,  
Ronald Lee Dowell, and Ruth C. Dowell, are .....

Respondents

**Motion for Extension of Time**

Pursuant to Rules 221(a) and 240 of the South Carolina Appellate Court Rules, Appellant  
JPMorgan Chase Bank, National Association, moves this Court for an order granting a fifteen (15)

day extension of time to file a Petition for Rehearing in the above-captioned appeal. This is Appellant's first extension request for an extension of this deadline following receipt of the Unpublished Opinion No. 2018-UP-076, filed February 7, 2018.

This request is necessitated due to undersigned counsels' numerous other work conflicts, scheduling deadlines, and other currently existing obligations. The current deadline for a Petition for Rehearing is February 22, 2018, and with a fifteen (15) day extension, the new deadline would be March 9, 2018.

Accordingly, Appellant respectfully moves this Court for an extension of the deadline for its Petition for Rehearing to March 9, 2018. Appellant asks that the current deadline be held in abeyance pending the Court's resolution of this motion.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for JPMorgan Chase Bank, National Association

February 16, 2018

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In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
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The Honorable R. Markley Dennis, Jr.  
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Starr D. Acheson, individually, as Legal Heir and  
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Amber Mae Acheson Reed, Joseph Lynn Acheson, Jr.,  
Jacob Lee Acheson, and Daniel Alexander Acheson, as  
Legal Heirs or Devisees of the Estate of Joseph L.  
Acheson a/k/a Joseph Lynn Acheson, Sr., Deceased,  
Ronald Lee Dowell, Ruth C. Dowell, and Charleston  
County Revenue Collections, ..... Defendants.


Of whom Delilah Starr Acheson a/k/a Delilah S.  
Acheson a/k/a Starr D. Acheson, individually, as Legal  
Heir and Personal Representative of the Estate of  
Joseph L. Acheson a/k/a Joseph Lynn Acheson, Sr.,  
Deceased, Amber Mae Acheson Reed, Joseph Lynn  
Acheson, Jr., Jacob Lee Acheson, and Daniel  
Alexander Acheson, as Legal Heirs or Devisees of the  
Estate of Joseph L. Acheson a/k/a Joseph Lynn  
Acheson, Sr., Deceased, Ronald Lee Dowell, and Ruth  
C. Dowell, are ..... Respondents

**PROOF OF SERVICE**

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for JPMorgan Chase Bank, National Association, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings:                   **Motion for Extension of Time**

Counsel Served:            **U.S. Mail**  
Alice F. Paylor, Esq.  
Rosen Rosen & Hagoood, LLC  
Post Office Box 893  
Charleston, SC 29402

  
\_\_\_\_\_  
Kim R. Smith  
Administrative Assistant

February 16, 2018



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SC Court of Appeals

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street (29201)  
Post Office Box 11629  
Columbia SC 29211

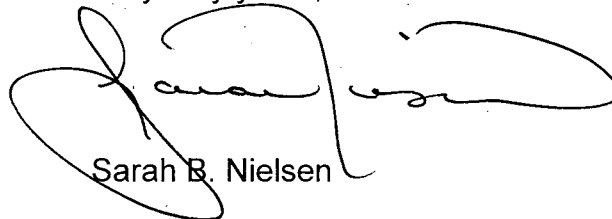
RE: JPMorgan Chase Bank, National Association v. Delilah Star Acheson, et al.  
Appellant Case No. 2016-00028  
Our File No. 11281/02229

Dear Ms. Kitchings:

Enclosed for filing in the above-reference matter please find the original and seven copies of a Motion for Extension of Time. Please return a clocked-in copy to us via our courier.

By copy of this letter, we are serving all counsel with this document.

Very truly yours,



Sarah B. Nielsen

SBN:krs  
Enclosures  
cc: Alice F. Paylor, Esquire

J