

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS

J. C. Nicholson, Jr., Ninth Judicial Circuit

Case No. 2012-CP-10-7008

RECEIVED
MAR 05 2018
SC Court of Appeals

The Bank of New York Mellon f/k/a The Bank of New Your, as successor
in interest to JP Morgan Chase Bank, N.A. as Trustee for Bear Stearns,
Asset Backed Securities Trust 2006-SD3, Asset Backed Certificates
Series 2006-SD3Respondent

v.

Carl D. Hamm, Jan H. Jernigan n/k/a Jan Hamm, Mortgage Electronic
Registration Systems, Inc., as nominee for Countrywide Home Loans Inc.;
United States of America, acting by and through its agency the Internal Revenue
Service; and Midland Funding, LLC ,

of whom Carl D. Hamm and Jan Hamm are the Appellants.

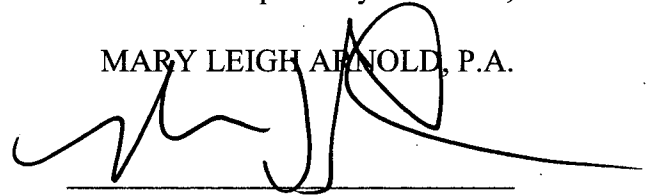
NOTICE OF MOTION AND
MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEFS

The Appellants Carl D. Hamm and Jan Hamm, by and through their undersigned counsel, hereby move this Court for an order granting a sixty (60) day extension, or until May 4, 2018, in which to file Appellants Initial Brief. Respondent has consented to the requested relief.

March 1, 2018

Respectfully submitted,

MARY LEIGH ARNOLD, P.A.



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Attorney for Appellants

Other Counsel of Record:
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Attorney for Respondent

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PROOF OF SERVICE

I hereby certify that I have served the Notice of Motion and Motion for Extension
of Time to File Initial Briefs by depositing a copy of the same on March 1, 2018 in the
United States Mail, postage pre-paid, addressed to the below Counsel of Record:

Brian Montgomery Barnwell, Esquire
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SC Court of Appeals

March 1, 2018

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

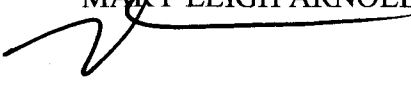
RE.: The Bank of New York Mellon, f/k/a The Bank of New York, as
successor-in-interest to JP Morgan Chase Bank, N.A. as Trustee for Bear
Stearns Asset Backed Securities Trust 2006-SD3, Asset-Backed
Certificates Series 2006-SD3 v. Carl D. Hamm, et al.
CASE NO.: 2012-CP-10-7008
Appellate Case No. 2018-000011

Dear Ms. Kitchings:

Enclosed for filing is an original Notice of Motion for Extension of Time to File Initial
Brief with regard to the above-referenced matter.

Should you have any questions or concerns please do not hesitate to contact me.

MARY LEIGH ARNOLD P.A.

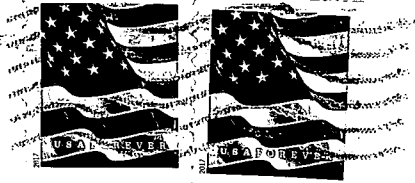

Mary Leigh Arnold

Enclosures/(as stated)
Cc: Brian Barnwell, Esq.

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