

86167

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM FAIRFIELD COUNTY  
Court of Common Pleas

Carol A. Tolen, Special Referee  
Trial Court Case No. 2012-CP-20-00132

Appellate Case No. 2018-000230

**RECEIVED**  
MAR 14 2018  
SC Court of Appeals

ArrowPointe Federal Credit Union, Respondent,

v.

Jimmy Eugene Bailey; Laura Jean Bailey; and U.S. Bank National Association not in its individual capacity but solely in its capacity as Indenture Trustee for WVUE 2015-1, Defendants,

Of which U.S. Bank National Association not in its individual capacity but solely in its capacity as Indenture Trustee for WVUE 2015-1 is the Appellant.

**MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 240 and 263, SCACR, the Appellant, through its undersigned attorneys, hereby moves this Court for an Order granting an Extension of Time for the filing of Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal. The grounds for this Motion are as follows:

1. The instant appeal was filed on February 16, 2018 and the current deadline for filing Appellant's Initial Brief and Designation of Matter to be included in the Record on Appeal is, upon information and belief, March 19, 2018.
2. Appellant has a copy of the written transcript, but is still waiting on two additional exhibits to the transcript from the court reporter.

3. The undersigned has not previously requested an extension of the instant time period and would therefore respectfully request an additional thirty (30) days from March 19, 2018 for the filing of Appellant's Initial Brief and Designation of Matter, which would make those items due on or before April 18, 2018.



---

Drew B. Walker (SC Bar No. 78271)  
Shaun C. Blake  
Rogers Lewis Jackson Mann & Quinn, LLC  
PO Box 11803  
Columbia, SC 29211  
P: 803-256-1268  
F: 803-252-3653

Sean Foerster, Esq.  
Rogers Townsend & Thomas, PC  
PO Box 100200  
Columbia, SC 29202  
Phone: 803-744-1855

*Attorneys for Respondent*

March 14, 2018

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM FAIRFIELD COUNTY  
Court of Common Pleas

Carol A. Tolen, Special Referee  
Trial Court Case No. 2012-CP-20-00132

---

Appellate Case No. 2018-000230

---

**RECEIVED**  
MAR 14 2018  
SC Court of Appeals

ArrowPointe Federal Credit Union, Plaintiff,

v.

Jimmy Eugene Bailey; Laura Jean Bailey; and U.S. Bank National Association not in its individual capacity but solely in its capacity as Indenture Trustee for WVUE 2015-1, Defendants,

Of Whom U.S. Bank National Association not in its individual capacity but solely in its capacity as Indenture Trustee for WVUE 2015-1 is the Appellant,

and Of Whom ArrowPointe Federal Credit Union is the Respondent.


---

**CERTIFICATE OF SERVICE**

---

I certify that I have served a copy of *Appellant's Motion for Extension of Time* by depositing a copy of the same in United States Mail, postage prepaid, on March 14, 2018, to Appellants' Attorney of record, listed herein:

Christy C. Jones, Esq.  
Sherpy & Jones, P.A.  
PO Box 2599  
Lexington, SC 29071  
*Attorney for Respondent*



\_\_\_\_\_  
Pamela Baker – Paralegal  
Rogers Lewis Jackson Mann & Quinn, LLC

March 14, 2018

# ROGERS LEWIS

ATTORNEYS AT LAW

Drew Walker  
Direct: (803) 978-2836  
dwalker@rogerslewis.com

March 14, 2018

Via Hand Delivery

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
MAR 14 2018  
SC Court of Appeals

RE: *ArrowPointe Federal Credit Union v. Jimmy Eugene Bailey, et al.*  
Appellate Case No. 2018-000230


Dear Ms. Kitchings:

Enclosed please find an original and six copies of Appellant's Motion for Extension of Time, Certificate of Service for same, and the Motion fee of \$25.00. Once filed, it may be returned in the enclosed envelope.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,

**ROGERS LEWIS JACKSON MANN & QUINN, LLC**



Drew Walker, Esq.

Enclosures

cc: Sean Foerster, Esq.  
PO Box 100200  
Columbia, SC 29202  
*Attorney for Appellant*

Christy C. Jones, Esq.  
Sherpy & Jones, P.A.  
PO Box 2599  
Lexington, SC 29071  
*Attorney for Respondent*