

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas  
The Honorable R. Keith Kelly  
Case No.: 2017-CP-42-02834  
Appellate Case No. 2018-000568

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**RECEIVED**  
JUN 12 2018  
SC Court of Appeals

Phillip Francis Luke Hughes, on behalf of the Estate of Jane K. Hughes.....Appellant

v.

Bank of America National Association.....Respondent.

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**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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RESPONDENT, Bank of America National Association ("Bank of America, N.A." or "Bank of America") pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules, hereby moves this Honorable Court for an additional fourteen (14) days to and including July 12, 2018, to file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

In support of its motion, Respondent respectfully shows this Honorable Court that Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal is due on June 28, 2018 and Respondent has not had sufficient time which to gather the information necessary to file its initial brief and designation of matter to be included in the record on appeal.

A proposed Order accompanies this motion.

June 11, 2018

Respectfully submitted,



Robert A. Muckenfuss (S.C. Bar No. 13903)  
MCGUIREWOODS LLP  
201 N. Tryon Street, Suite 3000  
Charlotte, NC 28202  
Telephone: (704) 343-2052  
Fax: (704) 444-8707  
[RMuckenfuss@mcguirewoods.com](mailto:RMuckenfuss@mcguirewoods.com)

Elizabeth M.Z. Timmermans  
(S.C. Bar No. 100288)  
McGuireWoods LLP  
434 Fayetteville St. Suite 2600  
Raleigh, NC 27601  
Telephone: (919) 755-6576  
[Eztimmermans@mcguirewoods.com](mailto:Eztimmermans@mcguirewoods.com)

*Attorneys for Respondent Bank of America, N.A*

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**ORDER**

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This cause coming on to be heard before the undersigned Clerk of the Court of Appeals on the motion of Respondent Bank of America National Association (“Bank of America, N.A.” or “Bank of America”), for an enlargement of time in which to file Respondent’s Initial Brief and Designation of Matter to be Included in the Record on Appeal, and it appearing to the Court that the motion should be allowed;

IT IS, THEREFORE, ORDERED that Respondent Bank of America’s time to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal is hereby extended fourteen (14) days to and including the 12<sup>th</sup> day of July, 2018.

This the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

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Clerk, South Carolina Court of Appeals

THE STATE OF SOUTH CAROLINA  
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**PROOF OF SERVICE**

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I certify that I have served a copy of the Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal upon counsel in this action by mailing a copy thereof, postage prepaid to D. Michael Kelly, Brad D. Hewett and Jamie N. Smith of Mike Kelly Law Group, LLC located at 500 Taylor Street, P.O. Box 8113, Columbia, South Carolina 29201.

June 11, 2018



Robert A. Muckenfuss (S.C. Bar No. 13903)  
MCGUIREWOODS LLP  
201 N. Tryon Street, Suite 3000  
Charlotte, NC 28202  
Telephone: (704) 343-2052  
Fax: (704) 444-8707  
[RMuckenfuss@mcguirewoods.com](mailto:RMuckenfuss@mcguirewoods.com)

Elizabeth M.Z. Timmermans  
(S.C. Bar No. 100288)  
McGuireWoods LLP  
434 Fayetteville St. Suite 2600  
Raleigh, NC 27601

Telephone: (919) 755-6576  
[Eztimmermans@mcguirewoods.com](mailto:Eztimmermans@mcguirewoods.com)

*Attorneys for Respondent Bank of America, N.A*

McGuireWoods LLP  
Fifth Third Center  
201 North Tryon Street  
Suite 3000  
Charlotte, NC 28202  
Tel 704.343.2000  
Fax 704.343.2300  
www.mcguirewoods.com

Antoine L. Robinson  
Direct: 704.343.2047

McGUIREWOODS

arobinson@mcguirewoods.com  
Direct Fax: 704.444.8813

June 11, 2018

**Federal Express Mail**

The Honorable Jenny Abbott Kitchens  
Clerk of Court, SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
JUN 12 2018  
SC Court of Appeals

Re: ***Phillip Francis Luke Hughes, on behalf of the Estate of Jane K. Hughes vs. Bank of America National Association***  
Appellate Case Number: 2018-000568  
Spartanburg County Case Number: 2017-CP-42-02834

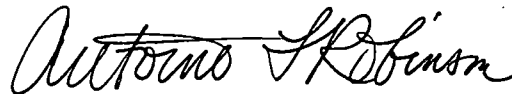
Dear Ms. Kitchens:

Please find enclosed an original and two (2) copies of the Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record of Appeal along with a Proposed Order and Proof of Service. If the Motion meets with your approval, please sign the order and forward the certified stamped copies to me in the envelope provided for your convenience.

By copy of this letter, I am serving all counsel of record.

Thank you in advance for your kind consideration in this matter.

Sincerely,  
McGuireWoods LLP



Antoine L. Robinson, NCCP  
Sr. Litigation Paralegal

Enclosures

cc: D. Michael Kelly, Esq.  
Brad D. Hewett, Esq.  
Jamie N. Smith, Esq.

ORIGIN ID: QWGA (704) 343-2000  
ANTOINET L. ROBINSON  
MCGUIREWOODS LLP  
201 NORTH TRYON ST  
SUITE 3000  
CHARLOTTE, NC 28202  
UNITED STATES US

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SC COURT OF APPEALS CLERK OF COURT  
1220 SENATE ST

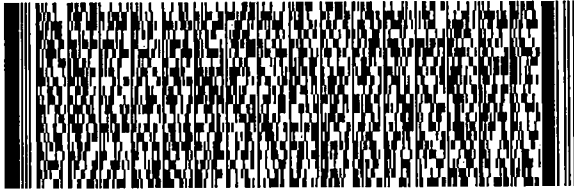
COLUMBIA SC 29201

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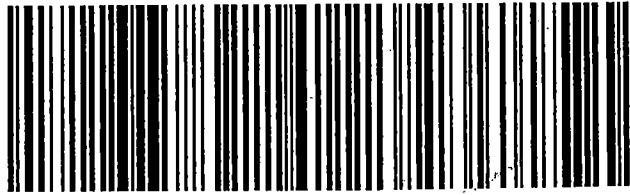


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JUN 12 2018

SC Court of Appeals

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