

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Mikell R. Scarborough, Master in Equity

Appellate Case No. 2018-001445

**RECEIVED**  
NOV 29 2018  
SC Court of Appeals

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U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2007-RP1,

Respondent,

v.

Betty P. Hafez; ARF Financial Services, LLC f/k/a Advance Restaurant Finance, LLC; Comprehensive Legal Solutions, Inc.; Midland Funding, LLC; Kiawah Island Community Association, Inc.,

Defendants,

Of whom Betty P. Hafez is the Appellant.

AND

Betty P. Hafez,

Third-Party Plaintiff, Appellant,

v.

Ocwen Loan Servicing, LLC

Third-Party Defendant, Respondent.

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MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF AND  
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

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Chad W. Burgess, Esq.  
Caroline R. Glenn, Esq.  
Brock & Scott, PLLC  
3800 Fernandina Road, Suite 110  
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(803) 454-3540  
Attorneys for Respondents

Other Counsel of Record:  
Robert B. Varnado, Esq.  
Alexis M. Wimberly, Esq.  
Brown & Varnado, LLC  
PO Box 1127  
Mount Pleasant, South Carolina 29465  
Attorneys for Appellant

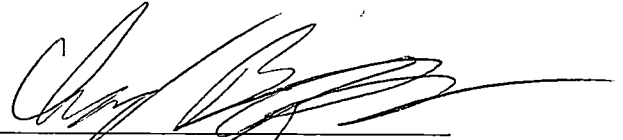
Respondents, through their undersigned counsel, respectfully request and move under Rule 263 of the South Carolina Appellate Court Rules for a thirty (30) day extension of time to file their Initial Brief and Designation of Matter due to scheduling and work conflict issues. The due date for Respondent's Initial Brief and Designation of Matter to be included in the record on appeal are currently due on or before November 30, 2018. With a thirty-day extension, Respondents' Initial Brief and Designation of Matter would be due on or before **December 31, 2018**. This is Respondents' first request for an extension of time.

WHEREFORE, Respondents respectfully request that this Court grant an additional 30 days to file and serve their Initial Brief and Designation of Matter to be included in the record on appeal.

November 27, 2018

**[SIGNATURE PAGE TO FOLLOW]**

Respectfully Submitted,



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Chad W. Burgess, Esq. (SC Bar# 72520)  
Caroline R. Glenn, Esq. (SC Bar# 77157)  
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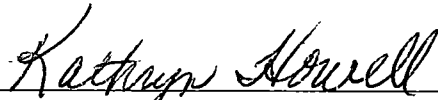
**CERTIFICATE OF SERVICE**

The undersigned certifies that, on November 27, 2018, Respondents' Motion for an extension of time to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal was served on Appellant by depositing a copy thereof in the United States Mail, first Class, postage prepaid, addressed to:

Robert B. Varnado, Esq.  
Alexis M. Wimberly, Esq.  
Brown & Varnado, LLC  
PO Box 1127  
Mount Pleasant, South Carolina 29465

November 27, 2018  
Served By:

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November 27, 2018

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

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Re: U.S. Bank v. Betty Hafez, et al.  
Appellate Case#: 2018-001445  
B&S file #: 14-13980

Dear Ms. Kitchings:

Enclosed please find the original and one copy of a Motion for Extension of Time to Serve and File the Respondents' Initial Brief and Designation of Matter to be included in the record on appeal with regard to the above referenced matter. Kindly file the same and return a clocked copy to me in the enclosed self-addressed stamped envelope. I have also enclosed a check for \$25.00 for the filing fee.

Please do not hesitate to contact me if you should have any questions. Thank you in advance for your assistance in this matter.

Sincerely,

Chad W. Burgess, Esq.

Enclosures

CC: Robert B. Varnado, Esq.  
Alexis M. Wimberly, Esq.

J

COLUMBIA



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