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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APR 29 2019

**SC Court of Appeals**

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Marvin H. Dukes, III, Master in Equity

Case No. 2011-CP-07-0340  
Appellate Case No.: 2019-000047

TD Bank, N.A., Successor by merger to Carolina first Bank, .....Respondent,

vs.

Wilbert Roller, Jr., Betty V. Roller, and James Williams, .....Defendants,

of whom

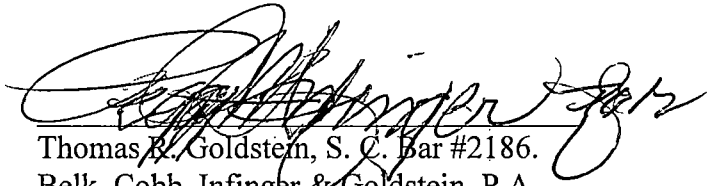
Wilbert Roller Jr. and Betty V. Roller are the..... Appellants.

MOTION FOR NINETY DAY EXTENSION

The appellants, Wilbert Roller Jr. and Betty V. Roller, request a ninety-day extension to file and serve their initial brief and their designation of contents of record on appeal. This motion is based on the ground that appellant's counsel became seriously ill on April 22, 2019, which required appellant's counsel to be admitted to the hospital. Appellant's counsel needs to undergo surgery and will be under physician care for at least 10 weeks. This request makes the Appellant's initial brief due on or before Thursday, July 25, 2019.

April 23, 2019

Other counsel of Record:  
Mr. Matthew E. Tillman  
Womble Carlyle Sandridge & Rice, PLLC  
P.O. Box 999  
Charleston, SC 29402




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Thomas R. Goldstein, S. C. Bar #2186.  
Belk, Cobb, Infinger & Goldstein, P.A.  
Attorneys for Respondent  
P. O. Box 71121  
N. Charleston, South Carolina 29415-1121  
(843) 554-4291; (843) 554-5566 (fax)  
E-mail: [tgoldstein@cobblaw.net](mailto:tgoldstein@cobblaw.net)

### CERTIFICATE OF CONSULTATION

I certify that prior to filing this request, I consulted with opposing counsel who does not object to the request.

April 23, 2019



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Rebekah Lambooy, Paralegal  
Thomas R. Goldstein, S. C. Bar No. 2186

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vs.

Wilbert Roller, Jr., Betty V. Roller, and James Williams, .....Defendants,

of whom

Wilbert Roller Jr. and Betty V. Roller are the..... Appellants.

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PROOF OF SERVICE

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I certify that I have served the Appellant's Request for Ninety Day Extension on the Respondent, TD Bank, N.A., Successor by merger to Carolina First Bank, by depositing a copy of it in the United States Mail, postage prepaid, on April 24, 2019, addressed to the attorneys of record, Matthew E. Tillman, P.O. Box 999, Charleston, S. C. 29402.

April 24, 2019



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Rebekah Lambooy, Paralegal  
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Attorneys for the Appellants

**BELK, COBB, INFINGER AND GOLDSTEIN, P.A.**

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April 24, 2019

Hon. Jenny Abbott Kitchings  
Clerk of Court  
ATTN.: Amelia Smith  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

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APR 29 2019

SC Court of Appeals

Re: TD Bank, N.A., Successor by Merger to Carolina First Bank vs.  
Wilbert Roller, Jr., Betty V. Roller, and James Williams,  
Case No.: 2011-CP-07-0340  
Appellate Case No.: 2019-000047

Dear Ms. Kitchings,

I am requesting a ninety-day extension to file appellant's initial brief. Tommy Goldstein, Attorney for Appellants, suffered a heart attack Monday and was admitted to the hospital. He will undergo surgery along with 6 weeks of rehabilitation. Enclosed please find a motion for extension, our firm's check, and a certificate of service. Please contact me if you need anything further from me. With kind regards, I am

Very truly yours,  
BELK, COBB, INFINGER & GOLDSTEIN, P.A.



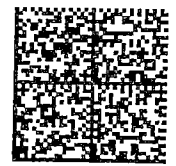
Rebekah Lambooy, Paralegal to  
Thomas R. Goldstein

/ral  
enclosure: check No. 18723  
cc: Matthew Tillman, Esq.

Belk Cobb Infinger & Goldstein, PA  
P.O. Box 71121  
North Charleston, SC 29415-1121

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SC 294  
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Hon. Jenny Abbott Kitchings  
Clerk of Court  
ATTN.: Amelia Smith  
South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

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SC Court of Appeals

29211-162929

