

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Perry H. Gravely, Circuit Judge

Appellate Case No. 2018-002070

**RECEIVED**  
JUN 20 2019  
SC Court of Appeals

Wells Fargo Bank, N.A.,.....Respondent,

v.

D. Bruce Wolff,.....Appellant.

RETURN TO MOTION TO DISMISS

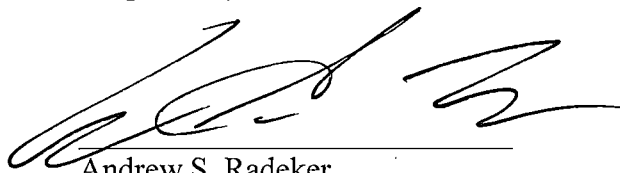
Appellant hereby submits this return to the Respondent's motion to dismiss his appeal. The motion to dismiss the appeal should not be granted, as the following shows:

1. Respondent seeks a drastic result – the dismissal of this appeal – because Respondent feels that Appellant has sought too many extensions without a good enough reason for them. Respondent has not shown a good reason for the dismissal of this appeal.
2. Rule 260(a), SCACR, provides for dismissal of an appeal for an appellant's failure to comply with the South Carolina Appellate Court Rules. Respondent does not contend that Appellant has violated the Rules.
3. Respondent has also failed even to argue, much less demonstrate, that any conduct of Appellant has prejudiced Respondent.

4. Respondent simply asks that this court dismiss this appeal because that is what Respondent wants.
5. The time to serve and file a return to Appellant's motion for an extension has run, and, to the undersigned's knowledge, Respondent has not done so. Accordingly, Respondent may be deemed to have consented to the extension sought by Appellant. Rule 240(e), SCACR.
6. By the time the court reviews Respondent's motion, this return, and any reply, it is likely that Appellant's initial brief and designation will have been served and filed.
7. If it were not for having to deal with the Respondent's motion to dismiss, Appellant's counsel might be able to work on the brief in this appeal at the very moment of the writing of this document. Instead, he is drafting this return.

WHEREFORE Appellant prays the Respondent's motion to dismiss be denied.

Respectfully submitted,



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June 20, 2019

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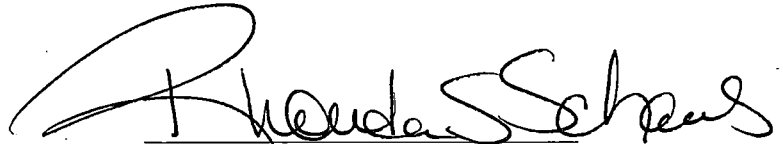
PROOF OF SERVICE

I certify that I served the foregoing return in this case by depositing a copy of it on the date shown below in the United States Mail, postage prepaid, addressed as follows:

Theodore von Keller, Esq.  
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P.O. Box 4216  
Columbia, SC 29240

June 20, 2019

Respectfully submitted,



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