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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
OCT 25 2019
SC Court of Appeals

APPEAL FROM AIKEN COUNTY
Court of Common Pleas
Doyet A. Early III, Circuit Judge

Appellate Case No. 2018-002068

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

v.

Michael G. Morgan; Margaret H. Fitch, M.D.; Eric J. Olig; South Carolina Department
of Revenue; Linda Lawrence Bowen; Defendants,

Of whom Michael G. Morgan is the.....Appellant.

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

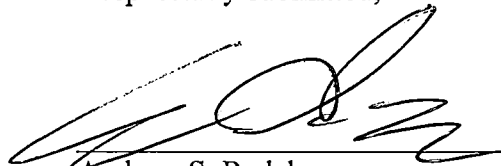
Appellant hereby moves pursuant to Rule 263(b), SCACR, for an extension to
November 12, 2019, of the time in which to serve and file Appellant's initial reply brief
and any accompanying designation of matter to be included in the record on appeal.
The grounds for this motion are that there is good cause to grant the requested
extension, as the following shows:

1. The deadline for Appellant to serve and file his initial reply brief and
any accompanying designation of matter to be included in the record
on appeal is currently Monday, October 28, 2019.

2. Respondent served its initial brief on Friday, October 18, 2019. Accordingly, Appellant's counsel received that brief on Monday, October 21, 2019.
3. Appellant's counsel had a trial yesterday, for which he spent significant time this week preparing.
4. Appellant's counsel is serving as the mediator for a case on Monday.
5. Appellant's counsel has not had time to digest Respondent's brief and needs more time to do so.
6. As shown by the attached email correspondence, opposing counsel consents to this extension.
7. Appellant's counsel believes there is good cause to grant the requested extension of this deadline.

WHEREFORE Appellant prays for an order extending the time in which to serve and file Appellant's initial reply brief and any accompanying designation of matter to be included in the record on appeal to November 12, 2019.

Respectfully submitted,



Andrew S. Radeker
S.C. Bar No. 73743
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
Attorney for Appellant

October 25, 2019

Drew Radeker

From: Spruill, Sarah <sspruill@hsblawfirm.com>
Sent: Wednesday, October 23, 2019 3:52 PM
To: Drew Radeker
Subject: Re: Wells Fargo v. Morgan

Of course.

Sarah Spruill

Sent via handheld. Please excuse any typographical errors.

On Oct 23, 2019, at 1:05 PM, Drew Radeker <Drew@harrisonfirm.com> wrote:

Sarah, do you mind if I get an extension through November 12 of the time to submit the reply brief in this case? I've got trial starting tomorrow and am being a mediator for a case on Monday.

Thanks.

Drew Radeker

<image002.png>

This e-mail message contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate it unless you are the addressee. If you have received it in error, please call us (collect) at (803) 779-2211 and ask to speak with the message sender. Also, we would appreciate your forwarding the message back to us and deleting it from your system. Any tax information or written tax advice contained herein (including any attachments) is not intended to be and cannot be used by any taxpayer for the purpose of avoiding tax penalties that may be imposed on the taxpayer. (The foregoing legend has been affixed pursuant to U.S. Treasury Regulations governing tax practice.) Thank you.

From: Spruill, Sarah <sspruill@hsblawfirm.com>
Sent: Thursday, August 29, 2019 10:05 AM
To: Drew Radeker <Drew@harrisonfirm.com>
Subject: RE: Wells Fargo v. Morgan

Thanks!

<image003.gif.attachctrl>

Sarah P. Spruill | Attorney
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of Revenue; Linda Lawrence Bowen; Defendants,

Of whom Michael G. Morgan is the Appellant.

PROOF OF SERVICE

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

Stacie C. Knight, Esq.
Winston & Strawn LLP
300 South Tryon Street, 16th Floor
Charlotte, NC 28202

Sarah P. Spruill, Esq.
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Mary O. Guynn, Esq.
Smith, Massey, Brodie, Guynn & Mayes
P.O. Box 519
Aiken, SC 29802

October 25, 2019

Respectfully submitted,

A handwritten signature in black ink that reads "Rhonda S. Schaub". The signature is written in a cursive style with a large, looping initial "R".

Rhonda S. Schaub
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