

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Steven C. Kirven, Master in Equity

Appellate Case No. 2019-001330

RECEIVED

NOV 05 2019

SC Court of Appeals

Deutsche Bank National Trust Company, as Trustee
for GSAMP Trust 2002-HE, Mortgage Pass-Through
Certificates, Series 2002-HE,.....Appellant,

v.

Garvin Gibson, Fredericka Gibson, Regional Finance,
and National Finance Company,..... Defendants,

Of whom Garvin Gibson is the Respondent

APPELLANT'S MOTION FOR EXTENSION OF TIME TO
FILE INITIAL BRIEF AND DESIGNATION OF MATTER

Pursuant to Rule 240 of the South Carolina Appellate Court Rules ("SCACR"), Appellant Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2002-HE, Mortgage Pass-Through Certificates, Series 2002-HE hereby moves for an extension of the deadline for filing its Initial Brief and Designation of Matter and, as grounds therefore, states as follows:

1 Appellant requests an extension of thirty (30) days until December 16, 2019 to file its Initial Brief and Designation of Matter.

2 Appellant and Respondent are currently in settlement discussions which if successful, may render the subject appeal moot.

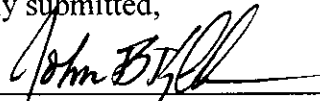
3 This is Appellant's first request for an extension of time to file its Initial Brief and Designation of Matter.

4 Counsel for Respondent has consented to Appellant's Request.

5 Appellant is seeking this extension for good reason as set forth in this motion and not for purposes of delay. No prejudice will result to any party as a result of the requested extension of time.

Dated: November 5, 2019

Respectfully submitted,



John B. Kelchner, S.C. Bar #13589
HUTCHENS LAW FIRM
P.O. Box 8237 (29202)
240 Stoneridge Dr., Suite 400
Columbia, SC 29210
803-726-2700
John.kelchner@hutchenslawfirm.com
*Attorney for Appellant Deutsche Bank National
Trust Company, as Trustee for GSAMP Trust 2002-
HE, Mortgage Pass-Through Certificates, Series
2002-HE*

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Steven C. Kirven, Master in Equity

Appellate Case No. 2019-001330

RECEIVED

NOV 05 2019

SC Court of Appeals

Deutsche Bank National Trust Company, as Trustee
for GSAMP Trust 2002-HE, Mortgage Pass-Through
Certificates, Series 2002-HE,.....Appellant,

v.

Garvin Gibson, Fredericka Gibson, Regional Finance,
and National Finance Company,..... Defendants,

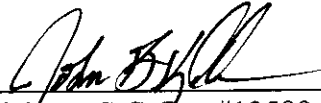
Of whom Garvin Gibson is the Respondent

CERTIFICATE OF SERVICE

I certify that I have served the Appellant Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2002-HE, Mortgage Pass-Through Certificates, Series 2002-HE's Motion for Extension of Time to File Initial Brief and Designation of Matter on the person(s) below by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2019 and addressed as follows:

Mr. James E. Sterling, Esq.
THE HENDRICKS FIRM, LLC
101-A NE Main St
Easley, SC 29640
Attorney for Respondent Garvin Gibson

Dated: November 5, 2019



John B. Kelchner, S.C. Bar #13589

HUTCHENS LAW FIRM

P.O. Box 8237 (29202)

240 Stoneridge Dr., Suite 400

Columbia, SC 29210

803-726-2700

John.kelchner@hutchenslawfirm.com

*Attorney for Deutsche Bank National Trust
Company, as Trustee for GSAMP Trust 2002-HE,
Mortgage Pass-Through Certificates, Series 2002-
HE*



HIGH PERFORMANCE LAW™

Foreclosure Department
Phone: 803-726-2700
Fax: 803-252-6822
HutchensLawFirm.com

Offices In:
Fayetteville, Charlotte, Wilmington, NC | Columbia, SC
240 Stoneridge Drive
Columbia, SC 29210

P.O. Box 8237
Columbia, SC 29202

November 5, 2019

The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

NOV 05 2019

SC Court of Appeals

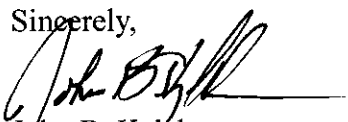
HAND-DELIVERED

Re: Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2002-HE, Mortgage Pass-Through Certificates, Series 2002-HE, Appellant vs. Garvin Gibson, Fredericka Gibson, Regional Finance, and National Finance Company, Defendants, of whom Garvin Gibson is the Respondent.
Appellate Case No. 2019-001330

Dear Sir/Madam:

Enclosed please find the original and six (6) copies of Appellant Deutsche Bank National Trust Company, as Trustee for GSAMP Trust 2002-HE, Mortgage Pass-Through Certificates, Series 2002-HE's Motion for Extension of Time to File Initial Brief and Designation of Matter regarding the above-referenced matter. By copy of this letter, I am serving counsel for the Respondent Garvin Gibson with a copy of the same.

Sincerely,


John B. Kelchner

Enc.

cc: Mr. James E. Sterling, Esq.
THE HENDRICKS FIRM, LLC
101-A NE Main St
Easley, SC 29640
Attorney for Respondent Garvin Gibson

THIS IS A COMMUNICATION FROM A DEBT COLLECTOR. THE PURPOSE OF THIS COMMUNICATION IS TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE, except as stated below in the instance of bankruptcy protection.

IF YOU ARE UNDER THE PROTECTION OF THE BANKRUPTCY COURT OR HAVE BEEN DISCHARGED AS A RESULT OF A BANKRUPTCY PROCEEDING, THIS NOTICE IS GIVEN TO YOU PURSUANT TO STATUTORY REQUIREMENT AND FOR INFORMATIONAL PURPOSES AND IS NOT INTENDED AS AN ATTEMPT TO COLLECT A DEBT OR AS AN ACT TO COLLECT, ASSESS, OR RECOVER ALL OR ANY PORTION OF THE DEBT FROM YOU PERSONALLY.