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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LANCASTER COUNTY
In The Circuit Court

Brian Gibbons, Circuit Court Judge
William C. Tindal, Special Referee

Appellate Case No. 2018-001823

First Citizens Bank & Trust Company,

Respondent,

v.

Linda P. Faulkner a/k/a Linda Faulkner,
Founders Federal Credit Union, and
CACH, LLC,
of whom Linda P. Faulkner is the

Appellant.

RECEIVED

NOV 19 2019

SC Court of Appeals

MOTION FOR EXTENSION OF TIME,
OR FOR THE RIGHT TO FILE OUTSIDE TIME

Pursuant to Rules 263(b) and 240, S.C.A.C.R., the Appellant, by her counsel undersigned, moves this Court for an order granting an extension of time in which to file and serve the Record on Appeal, or to be allowed to serve the same outside time, on the grounds stated below:

1. The Office of the Clerk for this Court has informed counsel that the due date for the Record on Appeal was November 8, 2019. By a miscalculation, counsel for the Appellant had that date marked as November 9, 2019, which date, with the weekend and Veterans Day, put the due date as November 12, 2019. The Record on Appeal was in fact mailed and served that date of November 12, 2019. This fact is shown on the Amended Proof of Service

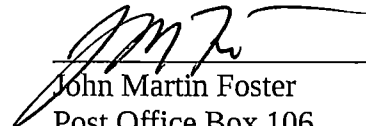
accompanying this Motion.

2. Counsel for the Appellant believes that equity will be served by allowing the filing of the Record of Appeal on the later date in question.

The basis of this Motion is the within-cited Rules, the records of this appeal, which items are hereby incorporated in this Motion.

WHEREFORE, the Appellant herein moves this Court for an extension of time, or for the right to file outside time, for a period until November 12, 2019 in which to serve Record on Appeal .

November 15, 2019



John Martin Foster
Post Office Box 106
Rock Hill, South Carolina 29731
(803) 324-8100
Attorneys for Appellant

Other Counsel of Record:

J. Kershaw Spong
Mary McDonald Campolong
Sowell Gray Robinson Stepp & Lafitte, LLC
Post Office Box 11449
Columbia. SC 29211
Attorneys for Respondent

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CERTIFICATE OF SERVICE

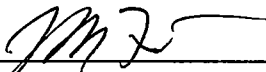
I certify that I have served the Appellant's Motion for Extension of Time, or to file outside time, dated November 15, 2019, on the following counsel or persons of record:

J. Kershaw Spong
Mary McDonald Campolong
Sowell Gray Robinson Stepp & Lafitte, LLC
Post Office Box 11449
Columbia. SC 29211
Attorneys for Respondent

by depositing the same with the United States mail, with sufficient first class postage attached, properly addressed to the clerk of the Court, and with a copy also directed to the respective last known address(es) of

those attorney(s) and/or persons set out above, pursuant to Rule 262(b), S.C.A.C.R.

November 15, 2019



John Martin Foster
Post Office Box 106
Rock Hill, S. C. 29731-6106
803 324-8100
Attorney for Appellant

JOHN MARTIN FOSTER

Attorney at law

The Guardian Building	PO Box 106	803 324 8100
223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

November 11, 2019

The Honorable Jenny Abbott Kitchings
Clerk of the South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: First Citizens Bank & Trust Company, Inc.
v. Linda P. Faulkner, *et al.*
Case No.: 2017-CP-29-00872
Appellate Case No. 2018-001823

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Dear Ms. Kitchings:

In accordance with Rule 210, S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Amended Proof of Service of the Record on Appeal.

We also enclose the original and seven (7) copies of the Appellants' Motion for Extension of Time, or to File Outside Time, together with Certificate of Service for the same in the above referenced case. I also enclose our check for the Motion fee of \$50.00.

By copy of this letter, I am serving the attorneys for the Respondent with copies of these documents, as evidenced by the Certificate of Service.

Please return the extra conformed copy to my office in the enclosed self-addressed, stamped envelope. As always, thank you, and your staff, for your assistance in these matters.

Sincerely yours,


John Martin Foster

jmf/
enclosures

cc: Client File

J. Kershaw Spong
Mary McDonald Campolong
Sowell Gray Robinson Stepp & Lafitte, LLC
Post Office Box 11449
Columbia, SC 29211
Attorneys for Respondent



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John Martin Foster Attorney
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Rock Hill SC 29731-6106

TO:

THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK OF THE COURT OF APPEALS
POST OFFICE BOX 11629
COLUMBIA, S.C. 29211

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