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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

**RECEIVED**  
DEC 04 2019  
SC Court of Appeals

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.

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 her final Brief and Reply Brief, or to be allowed to serve the same outside time, on the grounds stated below:

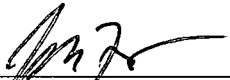
1. According to counsel's calculation, the due date for the final Brief and Reply Brief is December 2<sup>nd</sup>, 2019. Counsel has been prevented from completing the same due to a pending jury trial, a brief period of illness, a mechanical breakdown in his office and the press of business.

2. Counsel for the Appellant believes that equity will be served by allowing the filing of the final Brief and Reply Brief within an additional thirty (30) days.

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 an additional period of thirty (30) days in which to serve her final Brief and Reply Brief.

December 2, 2019

  
\_\_\_\_\_  
John Martin Foster  
Post Office Box 106  
Rock Hill, South Carolina 29731  
(803) 324-8100  
Attorney 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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of whom Linda P. Faulkner is the

Appellant.

CERTIFICATE OF SERVICE


I certify that I have served the Appellant's Motion for Extension of Time, or to file outside time, dated December 2, 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.

December 2, 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*

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223 East Main Street Suite 520	Rock Hill SC	803 324 8109 Fax
Rock Hill South Carolina 29730	29731-6106	jmfoster@comporium.net

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December 2, 2019

The Honorable Jenny Abbott Kitchings  
Clerk, 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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DEC 04 2019  
SC Court of Appeals

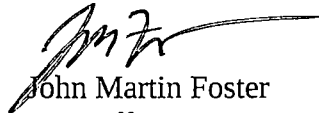
Dear Ms. Kitchings:

In accordance with Rules 240 and 263(b), S.C.A.C.R., enclosed herewith please find the original and seven (7) copies of the Appellants' Motion for Extension of 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 attorney for the Respondent with copies of the said Motion, 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,



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

jmf/  
enclosures

cc: J. Kershaw Spong  
Sowell Gray Robinson Stepp & Lafitte, LLC  
P.O. Box 11449  
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803 929-1400