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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No. 2019-001941

Bank of America, N.A.

Respondent,

v.

Janie C. Southern,

Appellant.

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DEC 18 2019

SC Court of Appeals

MOTION FOR ENLARGEMENT OF TIME TO FILE
INITIAL BRIEF OF APPELLANT AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Counsel for Appellant has determined the need for additional time to properly prepare the Initial Brief of Appellant and Designation Of Matter To Be Included in the Record On Appeal in this case.

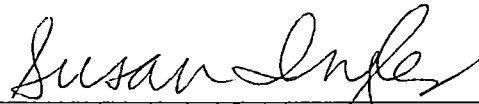
The extension requested is due to the current S.C. Legal Services case load of counsel for the Appellant, her grant reporting demands for duties at SCLS at this time, as well as a workshop she is conducting at the week-long Technology Innovation Conference of Legal Services Corporation in Portland, Oregon this January 2020.

Counsel for Appellant had already requested and received the trial transcript prior to filing the Notice of Appeal. Therefore, granting this extension would make the Initial Brief of Appellant and Designation of

Matter due on or before March 18, 2020. Counsel for Appellant has communicated by email with opposing counsel Joseph E. Brown and he stated he has no objection to the extension (see email attached hereto).

Appellant therefore requests an enlargement of time of ninety (90) days to file the Initial Brief of Appellant and Designation Of Matter To Be Included in the Record On Appeal.

Respectfully submitted,



Susan Ingles, Esq. Bar #4577
701 South Main Street
Greenville, South Carolina 29601
(864) 679-3244
Attorney for Appellant

December 16, 2019

Other Counsel of Record:
Joseph E. Brown, Esq. Bar #9085
Cooling & Winter, LLC
220 N. Main St., Suite 500
Greenville, SC 29601
Attorney for Respondent
(864) 605-3832 Ext. 4003

Susan Ingles

From: Joseph E. Brown <JBrown@coolingwinter.com>
Sent: Monday, December 16, 2019 11:40 AM
To: Susan Ingles
Subject: RE: Bank of America v. Janie Southern Appellate Case No. 2019-001941

I HAVE NO OBJECTION.

Thank you



Joseph E. Brown
Attorney | Cooling & Winter, LLC
P: 864.605.3832 ext. 4003
220 N Main Street, Suite 500 | Greenville, SC 29601

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THE DEBT COLLECTOR IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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From: Susan Ingles [mailto:susaningles@sclegal.org]
Sent: Monday, December 16, 2019 11:28 AM
To: Joseph E. Brown
Subject: Bank of America v. Janie Southern Appellate Case No. 2019-001941

I had already requested and received the transcript in this case (attached). According to Appellate Rule 208, that makes the Initial Brief and Designation of Matter due December 19, 2019 (30 days after serving Notice of Appeal). Due to my current caseload for SCLS and our end of the year grant reporting requirements, I am going to request a 90 day extension (until March 19) for filing and serving the initial brief and designation of matter. Do you have any objection to such a request?

Thanks,



Susan Ingles
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In The Court of Appeals

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Bank of America, N.A.

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PROOF OF SERVICE

I certify that I have served the following document on Bank of America, N.A. by depositing a copy in the United States Mail, postage prepaid, on December 16, 2019, addressed to its attorney of record, Joseph E. Brown, Cooling & Winter, LLC, 220 N. Main St., Suite 500 Greenville, South Carolina 29601:

MOTION FOR ENLARGEMENT OF TIME TO FILE
INITIAL BRIEF OF APPELLANT AND DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

December 16, 2019



Susan Ingles, Esq.
701 South Main Street
Greenville, South Carolina 29601
(864) 679-3244
Attorney for Appellant



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December 16, 2019

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201-3726

RE: Bank of America, N.A., Respondent v. Janie C. Southern, Appellant
Appellate Case No. 2019-001941

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SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing in the above referenced case are the following:

- 1) Motion For Enlargement of Time to File Initial Brief Of Appellant And Designation Of Matter to Be Included In The Record On Appeal (original and 6 copies)
- 2) Proof of Service
- 3) \$50.00 filing fee

Thank you for your consideration of this Motion. Please let me know if anything further is needed in order to render a decision.

Sincerely,

Susan Ingles

Encl.
cc: Joseph E. Brown





Susan Ingles
 South Carolina
 Legal Services
Member of the Bar of the State of South Carolina
 701 South Main Street
 Greenville, SC 29601



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

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