

# Turner | Padget

REPLY TO:

Jeffrey L. Payne

E-Mail: JPayne@TurnerPadget.com  
Writer's Direct Dial: (843) 656-4432  
Writer's Direct Fax: (843) 413-5825

December 17, 2019

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

RECEIVED

DEC 19 2019

SC Court of Appeals

Re: Walt Parker v. John Curl  
Appellate Case No.: 2019-001370  
TP File No.: 4009.105

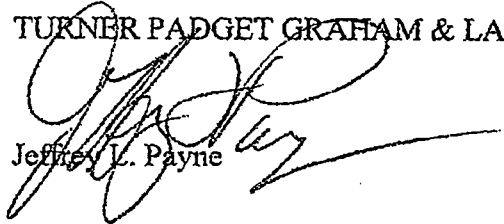
Dear Ms. Kitchings:

Our firm is counsel of record for the Respondent in this matter. Pursuant to my partner Rene' Josey's telephone conversation with Amelia of your staff, I am writing to informally request that the Court extend the Respondent's Initial Brief deadline by thirty days. The current deadline is Friday, December 27, 2019. I have consulted with counsel for the Appellant, W. Reynolds Williams, and he has consented to this request as is indicated by the email mailed yesterday. I understand that this Motion may be made informally by letter. I have previously mailed this firm's check in the amount of \$50.00 as payment and filing fee related to this Motion. I appreciate your assistance and that of your staff in this matter.

Yours very truly,

TURNER PADGET GRAHAM & LANEY P.A.

Jeffrey L. Payne



JLP:lap/lap  
Enclosures

cc: J. René Josey, Esq.  
W. Reynolds Williams, Esq. *✓ US Mail*

JURAT

RECEIVED

DEC 19 2019

SC Court of Appeals

SS

COUNTY OF DORCHESTER )

)

)

STATE OF SOUTH CAROLINA )

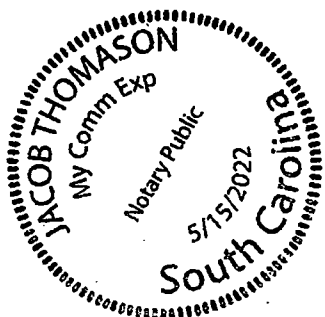
)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 12/17/2019.

By: Ashley Tucker  
Ashley Tucker  
155 Shady Ln.  
Summerville, South Carolina 29485  
843 557 2729

On this 18 day of December, 2019, before me personally came and appeared Ashley Tucker, known, and known to me, to be the living man described in and who executed the foregoing instrument, and who duly acknowledged to me that he executed same for the purpose therein contained. IN WITNESS WHEREOF, I hereunto set my hand and official seal.

Jacob Thomason  
Notary Public  
My Commission Expires: May 11, 2022  
Notary's Seal



**PROOF OF SERVICE OF  
MOTION TO PROCEED WITHOUT COST OF FILING FEES**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeal

APPEAL FROM DORCHESTER COUNTY  
Court of Master-in-Equity

James E. Chellis, Judge

Case No. 2019-CP-18-00302

RECEIVED

DEC 19 2019

SC Court of Appeals

Farmers & Merchant Bank of South Carolina, Respondent.

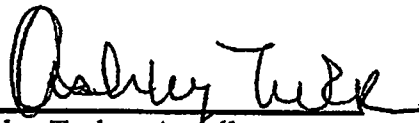
v.

Curtis R. Tucker; Ashley Tucker; SC Housing Corp.,  
Acting through South Carolina State Housing Finance  
And Employment Lending Program; and South Carolina  
Federal Credit Union, Defendant,  
of whom Ashley Tucker is the Appellant.

PROOF OF SERVICE

I certify that I have served the Motion to Proceed Without Costs on Farmers & Merchant Bank of South Carolina by depositing a copy of it in the United States Mail, Certified Mail with reg# 0000 0000 0000 0000 0000, on December 17<sup>th</sup>, 2019, addressed to their attorney of record, Elizabeth A. Blackwell, Post Office Box 22129, Charleston, South Carolina 29419.

December 16<sup>th</sup>, 2019

s/   
Ashley Tucker, Appellant  
155 Shady Ln.  
Summerville, South Carolina 29485



**PROOF OF SERVICE OF  
EMERGENCY MOTION TO STAY PENDING APPEAL**

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeal**

**APPEAL FROM DORCHESTER COUNTY  
Court of Master-in-Equity**

**James E. Chellis, Judge**

**Case No. 2019-CP-18-00302**

**RECEIVED  
DEC 19 2019  
SC Court of Appeals**

**Farmers & Merchant Bank of South Carolina, Respondent.**

**v.**

**Curtis R. Tucker; Ashley Tucker; SC Housing Corp.,  
Acting through South Carolina State Housing Finance  
And Employment Lending Program; and South Carolina  
Federal Credit Union, Defendant,  
of whom Ashley Tucker is the Appellant.**

**PROOF OF SERVICE**

I certify that I have served the Emergency Motion to Stay Pending Appeal on Farmers & Merchant Bank of South Carolina by depositing a copy of it in the United States Mail, Certified Mail with reg# 0000 0000 0000 0000 0000, on December 17<sup>th</sup>, 2019, addressed to their attorney of record, Elizabeth A. Blackwell, Post Office Box 22129, Charleston, South Carolina 29419.

December 17<sup>th</sup>, 2019

*s/ Ashley Tucker*  
Ashley Tucker, Appellant  
155 Shady Ln.  
Summerville, South Carolina 29485  
843 557 2929

# TURNER PADGET

## FAX TRANSMITTAL SHEET

Main Phone Number: (843)662-9008  
 Main Facsimile Number: (843)667-0828  
 Date:

PLEASE DELIVER AS SOON AS POSSIBLE TO:

| RECIPIENT | COMPANY               | FAX NO. | PHONE NO. |
|-----------|-----------------------|---------|-----------|
| Ameilia   | S.C. Court of Appeals | 803 734 | 1839      |

FROM: Jeff Payne E-MAIL DIRECT PHONE DIRECT FAX CLIENT/MATTER #:

Total number of pages including this cover sheet:

**IF THERE ARE ANY PROBLEMS RECEIVING THIS TRANSMISSION, PLEASE CALL (843)656-4407 IMMEDIATELY AND ASK FOR OUR MAIL ROOM. THANK YOU.**

Original Copy Via:  U.S. Mail;  Overnight Courier;  
 Hand-Delivered;  Facsimile Only

Time Sent: \_\_\_\_\_ Initials of Sender: \_\_\_\_\_

# RECEIVED

DEC 19 2019

SC Court of Appeals

THE INFORMATION CONTAINED IN THE FACSIMILE MESSAGE IS ATTORNEY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPY OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

Turner Padget Graham & Laney P.A.

BUSINESS - LITIGATION - SOLUTIONS

**Fax**

To: Amelia  
Fax: 803-734-1839  
Company: SC Court of Appeals

From: Jeff Payne  
Fax: 843-413-5818  
Voice: 843-656-4451

Date: December 18, 2019  
Subject:

Comments:

---

RECEIVED  
DEC 19 2019  
SC Court of Appeals