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JAN 10 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas  
Cynthia Graham Howe, Master in Equity

Case No.: 2013-CP-26-2528  
Appellate Case No. 2016-001550

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Branch Banking and Trust Company ..... Respondents,

v.

Cindy B. Hunt, Willow Greens Homeowners Association, Inc.,  
C.J. Developers, LLC..... Defendants,

Of whom Cindy B. Hunt is the ..... Appellant.

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**RESPONDENT’S MOTION FOR EXTENSION OF TIME**

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Sean M. Foerster (SC Bar # 77466)  
ROGERS TOWNSEND LLC  
1221 Main Street, 14<sup>th</sup> Floor (29201)  
Post Office Box 100200  
Columbia, South Carolina 29202-3200  
(803) 771-7900  
sean.foerster@rogerstownsend.com

Attorneys for the Respondent Branch Banking and  
Trust Company

January 10, 2020

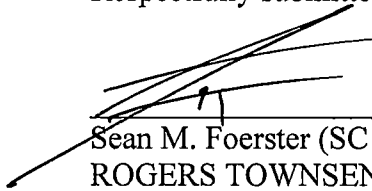
Respondent Branch Banking and Trust Company (“Respondent”) hereby moves for a 10-day extension of time to file and serve its Return to Appellant’s Petition for Rehearing.

“The court may in its discretion enlarge or limit the time for filing the return.” Rule 240(e), SCACR.

The present deadline for service and filing of Respondent’s Return to Appellant’s Petition for Rehearing is January 13, 2020. Counsel for Respondent is under an unusually heavy workload due to just recently returning to the office from being out of the country between December 30, 2019, and January 3, 2020, and due to a recent and significant increase in his file volume caused by the departure of another attorney in his department in late November 2019. Further, Appellant’s Petition for Rehearing is 65 pages long including its attachments, and the response to it will take significant time. Respondent’s counsel believes that there is good cause to grant the requested extension to January 23, 2020.

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file Respondent’s Return to Appellant’s Petition for Rehearing for an additional ten days, or until to January 23, 2020.

Respectfully submitted,



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Sean M. Foerster (SC Bar # 77466)  
ROGERS TOWNSEND LLC  
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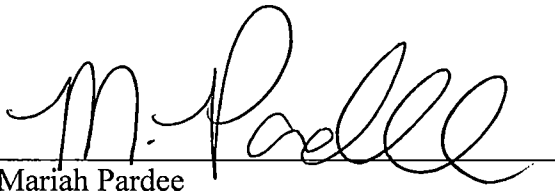
Cindy B. Hunt, Willow Greens Homeowners Association, Inc.,  
C.J. Developers, LLC..... Defendants,

Of whom Cindy B. Hunt is the .....Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I HEREBY CERTIFY that I have served the Respondent's Motion for Extension of Time on January 10, 2020, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

Cindy B. Hunt, *pro se*  
195 D Willow Green Drive  
Conway, South Carolina 29526



\_\_\_\_\_  
Mariah Pardee  
Legal Assistant to Sean M. Foerster  
ROGERS TOWNSEND LLC

ROGERS TOWNSEND LLC  
POST OFFICE BOX 100200 (29202)  
1221 Main Street, 14<sup>th</sup> Floor  
COLUMBIA, SOUTH CAROLINA 29201  
P 803.771.7900 F 803.343.7017  
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Sean M. Foerster  
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P 803.744-1855



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January 10, 2020

**Via Hand Delivery**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

RE: *Branch Banking and Trust Company vs. Cindy B. Hunt, Willow Greens Homeowners Association, C.J. Developers, LLC*  
Appellate Case # 2016-001550  
Our File # 504335-3166

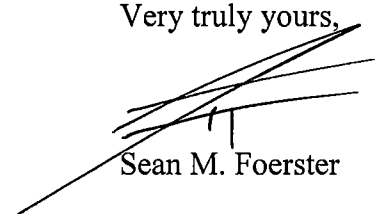
Dear Ms. Kitchings:

Enclosed are the original and seven copies of Respondent's Motion for Extension of Time to file Respondent's Return to Appellant's Petition for Rehearing and a Proof of Service in reference to the above matter, along with a check in the amount of \$25.00.

By copy of this correspondence, I am serving a copy of this motion on the Appellant.

Please return a filed copy of this document to me with the courier.

Very truly yours,



Sean M. Foerster

/tds  
Enclosure

cc:  
Cindy B. Hunt  
195 D Willow Green Drive  
Conway, South Carolina 29526