

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM MARION COUNTY
COURT OF COMMON PLEAS

FEB 25 2020

SC Court of Appeals

Case No. 2020-000139

Ex Parte Beullah Belin and James Belin, Appellants,

In re Wilmington Savings Fund Society, FSB, as trustee of
Stanwich Mortgage Loan Trust A, Plaintiff,

v.

Bertha Dunham a/k/a Bertha E. Dunham; and Ernest L. Dunham,
Defendant(s)

of which Wilmington Savings Fund Society, FSB, as trustee of Stanwich
Mortgage Loan Trust A is the Respondent

Respondents-Appellees.

MOTION TO EXTEND TIME

February 24, 2020

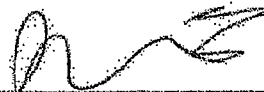
Paul B. Ferrara, III
S.C. Bar No. 70511
8887 Old University Blvd. Ste.200
North Charleston, SC 29406
(843) 569-5511
Attorney for Appellents

For good cause shown, Petitioners, Beullah Belin, by and through their attorney, Paul B. Ferrara, III hereby would respectfully ask this court for twenty (20) day extension of time to file the initial brief and designation of matter to be included on appeal. Counsel respectfully requests the Court extend the date for an additional twenty (20) days due to counsel being sick with influenza, court appearances and workload. Counsel received notice from the Special Referee, on February 12, 2020, that there was no transcript of the proceedings; thus, the deadline to file the initial brief would be due on or before March 14, 2020. Granting this motion would be make the new deadline April 3, 2020.

Attorney Paul B. Ferrara, III, contacted the Respondent's attorney, William Stork, via electronic mail and he has consented to an extension of time.

WHEREFORE, WHEREFORE, Petitioners respectfully pray that this Honorable Court enter an Order allowing an additional twenty (20) days to file the initial brief of Appellant and designation matter of be included on appeal making the new deadline April 3, 2020.

Respectfully Submitted,
FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III
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(843) 569-5411 Fax
Attorney for Petitioners

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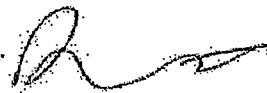
of which Wilmington Savings Fund Society, FSB, as trustee of Stanwich
Mortgage Loan Trust A is the Respondent

Respondents-Appellees.

PROOF OF SERVICE

I, the undersigned counsel, hereby certify that I have served the Appellant's letter requesting a Motion to Extend Time upon the Respondents, **Peter M. Balthazor**, by depositing a copy of the same in the United States Mail, postage prepaid, on December 19, 2019, addressed to their attorney of record, Peter M. Balthazor, Riley Pope and Lancy, P.O. Box 11412 (29211), Columbia, SC 29205

Respectfully submitted this 24th day of February 24, 2020.



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Paul B. Ferrara, III*
Janel K. Ferrara*

*(also Admitted in N.C.)

February 24, 2020

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Ex Parte Beullah and James Belin (Wilmington Savings Fund
Society v. Bertha Dunham)
Appellate Case No.: 2020-000139
Our File No.: 19-561

Dear Ms. Kitchings:

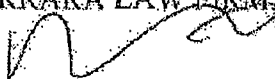
Please accept this motion to extend time to file the intial brief and designation of matter to be included in the record on appeal.

I have enclosed is a proof of service regarding the same. I have enclosed a check representing the motion fee.

Please file the original and return a clocked copy to our office in the self-addressed, stamped envelope which is enclosed.

Sincerely,

FERRARA LAW FIRM, PLLC



Paul B. Ferrara, III

Enclosures

cc: Peter M. Balthazor
Attorney for Respondents