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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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MAR 19 2020


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 hereby requests additional time until March 31, 2020 to properly complete preparation and filing of the Initial Brief of Appellant and Designation Of Matter To Be Included in the Record On Appeal in this case. The Court graciously extended the time until March 19, 2020 in response to a previous motion. Due to these unexpectedly extraordinary times in which we at S.C. Legal Services are focusing on meeting the emergency legal needs of our low income and elderly clients, the undersigned counsel for the Appellant humbly requests the extension.

Respectfully submitted,

March 17, 2020

A handwritten signature in cursive script that reads "Susan Ingles". The signature is written in black ink and is positioned above a horizontal line.

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

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

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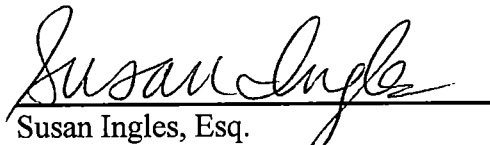
Appellant

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 March 17, 2020, 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

March 17, 2020


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



**South Carolina
Legal Services**

Balancing the Scales of Justice

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www.sclegal.org | www.lawhelp.org/sc | www.probono.net/sc

March 17, 2020

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

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MAR 19 2020

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

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.

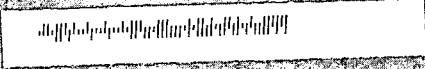
Sincerely,

Susan Ingles

Encl.

cc: Joseph E. Brown






 South Carolina
 Legal Services
Established by the State of South Carolina
 701 South Main Street
 Greenville, SC 29601

RECEIVED

MAR 10 2020

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

SC Court of Appeals