

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM YORK-COUNTY
Daniel D. Hall, Circuit Court Judge

APR 01 2020
SC Court of Appeals

Case No. 2018-CP-46-01592

Karen K. Baber, Appellant,

v.

Summit Funding, Inc., Appraisail Innovations, LLC, Brian L. Blue, The Gillen Law Firm, P.A.,
Michael F. Gillen, Allen Tate Co., Inc., Colleen Coesens, Jonathan Garvey, Robert Ouzts, Connie
Delaney, and Gloria Long-Robinson,

Of Which Summit Funding Inc., Allen Tate Co., Inc., Colleen Coesens, Jonathan Garvey, Robert
Ouzts, Connie Delany, and Gloria Long-Robinson are the Respondents.

MOTION FOR EXTENSION OF TIME

Pursuant to Rules 208 and 240 of the South Carolina Appellate Court Rules and the Order
issued by the Supreme Court of South Carolina on March 20, 2020, regarding Operation of the
Appellate Courts During the Coronavirus Emergency, Appellant, through her undersigned
Counsel, hereby moves this Court for an Order granting an extension of time to file and serve the
Appellant's Record on Appeal in the above-captioned action.

Appellant filed her Initial Brief and Designation of Matter on January 21, 2020.
Respondents' Initial Briefs and Designations of Matter were due on February 20, 2020. Currently,
Appellant's Record on Appeal was due on or about March 21, 2020. Pursuant to the Supreme
Court's Order dated March 20, 2020, "the due dates for all Appellate Court filings due on or about

the effective date of this order are hereby extended twenty (20) days." This Order thus allows Appellant to file her Record on Appeal on or about April 10, 2020.

Unfortunately, Glenn E. Bowens, Esquire, has been battling health issues unrelated to the coronavirus and was recently hospitalized. Additionally, the unprecedented effect of the coronavirus has significantly altered the undersigned counsels' day-to-day operations. Due to the hospitalization of Attorney Bowens and the current evolving situation regarding the coronavirus, the undersigned party requests an extension of time of an additional thirty (30) days to file and serve their Record on Appeal. If the Motion for Extension is granted as proposed, the new deadline for the Appellant's Record on Appeal is Monday, May 11, 2020. This is Appellant's first request for an extension of this deadline.

Respectfully submitted,

s/Glenn E. Bowens
Glenn E. Bowens (SC Bar # 70870)
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Attorneys for the Appellant

Winnsboro, South Carolina
April 1, 2020

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Delaney, and Gloria Long-Robinson,

Of Which Summit Funding Inc., Allen Tate Co., Inc., Colleen Coesens, Jonathan Garvey, Robert
Ouzts, Connie Delaney, and Gloria Long-Robinson are the Respondents.

PROOF OF SERVICE

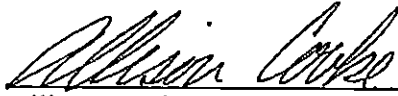
The undersigned hereby certifies that on the date indicated below she served counsel for
the Respondents with a copy of the Motion for Extension by mailing copies of the same by United
States Mail, first class, postage prepaid, to the following addresses:

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*Attorney for Respondents Allen Tate Co. Inc., Colleen Coesens, Jonathan Garvey, Robert
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Attorney for Respondent Gloria Long-Robinson

April, 2020


Allison Cooke, Paralegal

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April 1, 2020

Via US Mail and facsimile (803) 734-1839
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

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SC Court of Appeals

Re: Karen K. Baber v. Summit Funding, Inc., et al.
Appellate Case No.: 2019-001440
York County Case No. 2018-CP-46-01592


Dear Ms. Kitchings:

Please find enclosed an original and one (1) copy of a *Motion for Extension of Time* for filing in the above-referenced matter. Once these documents have been filed, please return the file-stamped copy to our office in the enclosed self-addressed stamped envelope.

By copy of this letter, we are serving all counsel of record a copy of the same.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Yours very truly,


Creighton B. Coleman

CBC/arc

cc: Susan Elizabeth Driscoll (w/ encl.)
Thomas Lynn Ogburn, III (w/ encl.)
Montrie Montess Belton, Sr. (w/ encl.)
Glenn E. Bowens (w/ encl.)