

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Diane S. Goodstein  
Circuit Court Judge

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Appellate Case No. 2020-000162

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Pinnacle Bank, as successor in  
interest to Bank of North  
Carolina, previous successor  
in interest to Harbor National  
Bank, Plaintiff

**RECEIVED**

**Apr 15 2020**

**SC Court of Appeals**

v.

Anthony Whitfield and Cindy  
Whitfield, Defendants

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Anthony Whitfield,  
Counterclaimant

v.

David Swanson, Counterclaim  
Defendant

of whom

Anthony Whitfield is the Appellant and David Swanson is the Respondent.

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**MOTION FOR EXTENSION OF TIME**

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Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Anthony

Whitfield (“Appellant”) respectfully requests a thirty (30) day extension of time to file the Initial Brief of Appellant and Designation of Matter in the above-captioned appeal. This is Appellant’s second request for extension.

This request is necessitated due to the extraordinary circumstances resulting from the current Coronavirus (Covid-19) state of emergency, which has caused unforeseeable and unprecedented interruptions to counsel’s practice.

Pursuant to the March 20, 2020 Order of the Supreme Court re: Operation of Appellate Courts During the Coronavirus Emergency, Appellant’s Initial Brief and Designation of Matter are currently due on April 23, 2020. If the request is granted, Appellant’s new due date would be May 26, 2020. Accordingly, Appellant respectfully requests that this Court enter an Order extending the deadline for the Initial Brief of Appellant and Designation of Matter until May 26, 2020. Appellant further requests that the current deadline be held in abeyance while the Court considers this request.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)  
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and

Brent S. Halversen, Esquire  
SC Bar No. 76495  
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and

Daniel S. Slotchiver, Esquire  
SC Bar No. 15129  
Andrew J. McCumber, Esquire  
SC Bar No. 101559  
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Mount Pleasant, SC 29464  
(843) 577-6531

**Attorneys for Appellants**

Charleston, South Carolina  
April 15, 2020

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**PROOF OF SERVICE**

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I, the undersigned, certify that I have served the *Motion for Extension of Time* on Respondent

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David Swanson, by emailing a copy on April 15, 2020, addressed to his attorneys of record at the following email addresses: David W. Overstreet, Esq. (david@earhartoverstreet.com), Michael B. McCall, Esq. (mike@earhartoverstreet.com), and Steven R. Kropski, Esq. (steve.kropski@earhartoverstreet.com).

Pursuant to the March 20, 2020 Order of the Supreme Court, a copy of the aforementioned email correspondence is attached.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez  
Jesse Sanchez (SC Bar No. 101906)  
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andrew@slotchiverlaw.com

**Attorneys for Appellants**

Charleston, South Carolina  
April 15, 2020



**From:** **Jesse Sanchez** jesse@jessesanchezlaw.com

**Subject:** Pinnacle Bank, as successor in interest to Bank of North Carolina, previous successor in interest to Harbor National Bank, Plaintiff, v. Anthony Whitfield and Cindy Whitfield, Defendants. AND Anthony Whitfield, Counterclaimant, v. David Swanson, Counterclaim Defendant, Of whom, Anthony Whitfield is the Appellant and David Swanson is the Respondent. Appellate Case No. 2020-000162

**Date:** April 15, 2020 at 3:54 PM

**To:** david@earhartoverstreet.com, mike@earhartoverstreet.com, steve.kropski@earhartoverstreet.com

**Cc:** Dan dan@slotchiverlaw.com, Andrew J. McCumber andrew@slotchiverlaw.com, Brent Halversen Brent@halversenlaw.com

Counsel,

Attached for service, please find the Cover Letter and Motion for Extension of Time that is being filed momentarily with the Court of Appeals today via OneDrive electronic submission.

Regards,

Jesse

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**Apr 15 2020**  
**SC Court of Appeals**

--  
 Jesse Sanchez  
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April 15, 2020

**VIA ONE DRIVE ELECTRONIC SUBMISSION**

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

**RE: Pinnacle Bank, as successor in interest to Bank of North Carolina, previous successor in interest to Harbor National Bank, Plaintiff, v. Anthony Whitfield and Cindy Whitfield, Defendants. AND Anthony Whitfield, Counterclaimant, v. David Swanson, Counterclaim Defendant, Of whom, Anthony Whitfield is the Appellant and David Swanson is the Respondent. Appellate Case No. 2020-000162**

Dear Ms. Kitchings:

Enclosed herewith please find *Appellant's Motion for Extension of Time* and corresponding *Proof of Service*.

Thank you for your assistance with this matter. Should you have any questions or wish to discuss the request, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez

Jesse Sanchez

Enclosures (as stated)

Cc (Via Email Only): Daniel S. Slotchiver, Esquire  
Andrew J. McCumber, Esquire  
Brent S. Halversen, Esquire  
David W. Overstreet, Esquire  
Michael B. McCall, Esquire  
Steven R. Kropski, Esquire

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2020-000162  
Anthon...20.pdf



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

s/Jesse Sanchez

Jesse Sanchez

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