

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
Gordon G. Cooper, Master-in-Equity

RECEIVED
Apr 20 2020
SC Court of Appeals

Appellate Case No. 2020-000454

U.S. Bank, NA, as trustee relating to the Chevy Chase Funding, LLC Mortgage Backed
Certificates, Series 2004-B,Plaintiff,

v.

Alyce F. Otto, Individually; Alyce F. Otto, Trustee Under Declaration of Trust of Alyce
F. Otto dated the 17th of November 2009; TD Bank, NA; The United States of America,
acting by and through its agency, the Internal Revenue Service; Laura Kerhulas Giese,
as Co-Trustee of the Theodore Ernest Kerhulas Trust Under Declaration of Trust dated
May 25, 2004; Mark Warner Kerhulas, as Co-Trustee of the Theodore Ernest Kerhulas
Trust Under Declaration of Trust dated May 25, 2004; Jackson L. Munsey, Jr.;
Citibank, NA,Defendants,

and

Alyce F. Otto, Trustee Under Declaration of Trust of Alyce F. Otto dated November
17, 2009.....Plaintiff,

v.

Jackson L. Munsey, Jr.....Defendant.

of whom Jackson L. Munsey, Jr., is the.....Appellant,

and

Alyce F. Otto, Individually; Alyce F. Otto, Trustee Under Declaration of Trust of Alyce
F. Otto dated the 17th of November 2009; Laura Kerhulas Giese, as Co-Trustee of the
Theodore Ernest Kerhulas Trust Under Declaration of Trust dated May 25, 2004; Mark
Warner Kerhulas, as Co-Trustee of the Theodore Ernest Kerhulas Trust Under
Declaration of Trust dated May 25, 2004 are the.....Respondents.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE INITIAL BRIEF
AND DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON
APPEAL

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The current COVID-19 pandemic and its attendant disruption of the ordinary functioning of business has disrupted Appellant's counsel's schedule and ordinary pace of work, affecting numerous matters, including the completion of the initial brief in this case.
2. Appellant's brief and designation of matter are presently due May 11, 2020, by operation of the current coronavirus administrative order. If the request is granted, Appellant's initial brief and designation of matter to be included in the record on appeal will be due on June 10, 2020.
3. This is the first extension Appellant has requested in this appeal. Appellant seeks this extension in order to accommodate the writing of two other appellate briefs to this court, which, if motions for extensions of those deadlines are granted, will be due 30 and 31 days from today.

4. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days, to June 10, 2020.

Respectfully submitted,

/s/ Andrew S. Radeker
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April 20, 2020