

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

Bentley D. Price, Circuit Court Judge

Appellate Case No. 2019-001732
Case No. 2017-CP-10-04445

Kathleen A. Grant; Dylan T. Grant; Devin D. Grant; and Andrea J. Grant,

Appellants,

v.

Nationstar Mortgage, LLC,

Respondent.

**RESPONDENT NATIONSTAR MORTGAGE, LLC'S MOTION
FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Respondent Nationstar Mortgage, LLC, pursuant to Rule 240(a), SCACR, respectfully requests an extension of time of thirty (30) days within which to file its Initial Brief and Record of Designation of Matter to be Included in the Record on Appeal.

Appellants filed their Notice of Appeal on October 10, 2019. After filing the Notice of Appeal, Appellants requested and obtained a transcript of the non-jury trial that is the subject of the pending appeal. Thereafter, Appellants requested and obtained three (3) separate thirty (30) day extensions for filing their Initial Brief. On March 9, 2020, Appellants filed their Initial Brief.

Thirty (30) days from the filing of Appellant's Initial Brief was Wednesday, April 8, 2020. However, pursuant to the Supreme Court Order 2020-03-20-01 entered in response to the

Coronavirus Emergency, the deadline for Nationstar to file its Initial Brief was extended for twenty (20) days. Therefore, Respondent's Initial Brief must be filed on or before Tuesday, April 28, 2020.

As a result of the continuing Coronavirus Emergency and counsel for Nationstar's current workload that they are handling remotely, Nationstar respectfully contends that good cause exists for an extension of time to file its Initial Brief.

WHEREFORE, Nationstar respectfully requests an order granting an extension of thirty (30) days to file its Initial Brief, up to and including Thursday, May 28, 2020.

s/John G. Tamasitis

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Attorneys for Respondent Nationstar Mortgage,
LLC

April 21, 2020
Columbia, South Carolina

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Kathleen A. Grant; Dylan T. Grant; Devin D. Grant; and Andrea J. Grant,

Appellants,

v.

Nationstar Mortgage, LLC,

Respondent.

CERTIFICATE OF SERVICE

The undersigned certifies on April 21, 2020, he caused a copy of the foregoing **RESPONDENT NATIONSTAR MORTGAGE, LLC'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF** to be served on counsel of record sent by electronic mail per Supreme Court Order 2020-03-20-01 and addressed as follows:

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Attorneys for Respondent Nationstar Mortgage, LLC

April 21, 2020
Columbia, South Carolina

From: [Tamasitis, John G.](#)
To: [Daniel S Slotchiver; "sas@spitzandneville.com"; "steve@slotchiverlaw.com"](#)
Cc: [Hershon, Lawrence M.](#); [Hewitt, Michelle](#)
Subject: Appellate Case No. 2019-001732: Motion to Extend Time to File Respondent's Initial Brief
Date: Tuesday, April 21, 2020 8:54:44 AM
Attachments: [Ltr to Court of Appeals re Motion to Extent Time to File Initial Brief.pdf](#)
[Respondent's Motion for Extension of Time to File Initial Brief.pdf](#)
[Respondents COS re Motion for Extension of Time to File Initial Brief.pdf](#)

Gentlemen,

Attached please find Respondent's Motion for Extension of Time to File Initial Brief and the corresponding Certificate of Service that will be hand delivered to the Court of Appeals this morning. Please let us know if you have any questions.

Thank you,

John



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Atlanta, GA
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Charlotte, NC
Columbia, SC
Greenville, SC
Raleigh, NC
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April 21, 2020

Via USPS Priority Overnight

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

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SC Court of Appeals

Re: *Kathleen A. Grant, et al. v. Nationstar Mortgage, LLC*
Appellate Case No. 2019-001732
Respondent's Motion for Extension of Time to File Initial Brief

Dear Mrs. Kitchings:

Enclosed is an original and one copy of Respondent Nationstar Mortgage, LLC's Motion for Extension of Time to File its Initial Brief and Certificate of Service, along with an email sent to Appellant's counsel, which confirms service.¹ Please return a file-stamped copy of the Respondent's Motion and Certificate of Service to my attention at 1221 Main Street, Suite 1100, Columbia, South Carolina 29201.

By copy of this letter, I am serving counsel for Appellants Kathleen A. Grant; Dylan T. Grant; Devin D. Grant; and Andrea J. Grant with a copy of the Motion for Extension of Time and Proof of Service via electronic means.

Thank you for your attention to this request.

Sincerely,

John G. Tamasitis

John G. Tamasitis

¹ Respondent has not included six copies of the Motion or provided a filing pursuant to the Supreme Court's Order, 2020-03-20-01, governing Operation of the Appellate Courts During the Coronavirus Emergency. See Order at (d), (l)(1). Further, Respondent has included an email that it sent to Appellants' counsel as part of its Certificate of Service per the Supreme Court's instructions. *Id.* at (g)(3).

April 21, 2020
Page 2

cc: Daniel S. Slotchiver (email)
Stephen M. Slotchiver (email)
Stephen A. Spitz (email)
Jesse Sanchez (email)

Enclosures

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*ATT 4/23 @ 620 a CS
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TO: The Honorable Jenny Abbot
Kitchings
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1015 Sumter Street
Columbia, SC 29211

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SC Court of Appeals

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