

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Diane S. Goodstein  
Circuit Court Judge

Appellate Case No. 2020-000162

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

Anthony Whitfield,  
Counterclaimant

v.

David Swanson, Counterclaim  
Defendant

of whom

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

**MOTION FOR EXTENSION OF TIME**

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

**RECEIVED**  
**May 08 2020**  
**SC Court of Appeals**

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 third request for extension.

This request is necessitated due to the unexpected demands caused by the Coronavirus (Covid-19) state of emergency, as well as demands and deadlines from other matters currently on appeal. A thirty day extension of time will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed brief in this matter. Appellant does not request this extension for the impermissible purpose of delay.

Appellant’s Initial Brief and Designation of Matter are currently due on May 13, 2020. If the request is granted, Appellant’s new due date would be Monday, June 16, 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 June 16, 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)  
The Law Office of Jesse Sanchez, LLC  
98 ½ Broad Street, Suite B  
Charleston, South Carolina 29401  
(843) 814-8181 Telephone  
(843) 284-3953 Fax  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

and

Brent S. Halversen, Esquire  
SC Bar No. 76495  
BRENT SOUTHER HALVERSEN, LLC  
751 Johnnie Dodds Blvd., Suite 200

Mount Pleasant, SC 29464  
(843) 284-5790

and

Daniel S. Slotchiver, Esquire  
SC Bar No. 15129  
Andrew J. McCumber, Esquire  
SC Bar No. 101559  
SLOTCHIVER & SLOTCHIVER, LLP  
751 Johnnie Dodds Boulevard, Suite 100  
Mount Pleasant, SC 29464  
(843) 577-6531

**Attorneys for Appellants**

Charleston, South Carolina  
May 8, 2020

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Diane S. Goodstein  
Circuit Court Judge

Appellate Case No. 2020-000162

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

Anthony Whitfield,  
Counterclaimant

v.

David Swanson, Counterclaim  
Defendant

of whom

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

**PROOF OF SERVICE**

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

**RECEIVED**  
**May 08 2020**  
**SC Court of Appeals**

David Swanson, by emailing a copy on May 8, 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)  
The Law Office of Jesse Sanchez, LLC  
98 ½ Broad Street, Suite B  
Charleston, South Carolina 29401  
(843) 814-8181 Telephone  
(843) 284-3953 Fax  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

and

Brent S. Halversen, Esquire  
SC Bar No. 76495  
BRENT SOUTHER HALVERSEN, LLC  
751 Johnnie Dodds Blvd., Suite 200  
Mount Pleasant, SC 29464  
(843) 284-5790  
[Brent@halversenlaw.com](mailto:Brent@halversenlaw.com)

and


Daniel S. Slotchiver, Esquire  
SC Bar No. 15129  
Andrew J. McCumber, Esquire  
SC Bar No. 101559  
SLOTCHIVER & SLOTCHIVER, LLP  
751 Johnnie Dodds Boulevard, Suite 100  
Mount Pleasant, SC 29464  
(843) 577-6531

dan@slotchiverlaw.com  
andrew@slotchiverlaw.com

**Attorneys for Appellants**

Charleston, South Carolina  
May 8, 2020



**From:** **Jesse Sanchez** [jesse@jessesanchezlaw.com](mailto: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:** May 8, 2020 at 7:21 AM  
**To:** [david@earhartoverstreet.com](mailto:david@earhartoverstreet.com), [mike@earhartoverstreet.com](mailto:mike@earhartoverstreet.com), [steve.kropski@earhartoverstreet.com](mailto:steve.kropski@earhartoverstreet.com)  
**Cc:** [dan@slotchiverlaw.com](mailto:dan@slotchiverlaw.com), [Brent Halversen Brent@halversenlaw.com](mailto:Brent@halversenlaw.com), [Andrew J. McCumber andrew@slotchiverlaw.com](mailto:Andrew J. McCumber andrew@slotchiverlaw.com)  
**Bcc:** [Jesse Sanchez jesse@jessesanchezlaw.com](mailto:Jesse Sanchez jesse@jessesanchezlaw.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 via OneDrive electronic submission.

Regards,

Jesse

--

Jesse Sanchez  
The Law Office of Jesse Sanchez, LLC  
98 1/2 Broad Street, Suite B  
Charleston, SC 29401  
P: (843) 814-8181  
F: (843) 284-3953  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

**CONFIDENTIALITY NOTICE**

This electronic mail transmission and any accompanying documents constitute information belonging to the sender and may be confidential and legally privileged. This information is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, any disclosure, copying, distribution, or action taken in reliance on the contents of the information contained in this transmission is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone at (843) 814-8181 and delete the message. Thank you.



2020-000162  
Anthon...20.pdf



May 8, 2020

VIA ONE DRIVE ELECTRONIC SUBMISSION

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

**RECEIVED**

**May 08 2020**

**SC Court of Appeals**

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

**THE LAW OFFICE OF JESSE SANCHEZ, LLC**

98½ Broad Street, Suite B, Charleston, SC 29401 P: 843.814.8181 F: 843.284.3953

[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com) [jessesanchezlaw.com](http://jessesanchezlaw.com)