

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE COURT OF COMMON PLEAS OF NEWBERRY COUNTY
Samuel M. Price, Jr., Special Referee

Appellate Case No. 2017-0001678

Robert G. Shirey,

RECEIVED

JUN 11 2020

SC Court of Appeals

Respondent,

v.

Gwen G. Bishop
Cassandra Robinson
And TD Bank, N.A

Defendants,

Of whom Gwen G. Bishop
and Cassandra Robinson are,

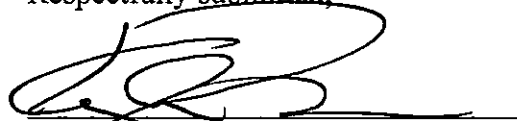
Appellants.

MOTION FOR EXTENSION

Respondent moves, pursuant to Rule 240, South Carolina Appellate Court Rules, for an extension of ten (10) days to file and serve his Return to the Appellant's Petition for Rehearing or leave to file said return outside of the time indicated by the Court. This motion is made with the consent of opposing counsel. The motion is based on the fact that the undersigned did not actually receive any correspondence (email or otherwise) from the Court requesting a return to the petition and only learned of the request from opposing counsel on the date of this motion. If such extension were granted, the new deadline would be June 19, 2020.

(Signature of Counsel Appears on Following Page)

Respectfully submitted,



Kyle B. Parker
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1508 College Street
Newberry, SC 29108
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Fax (803) 276-8684

Newberry, South Carolina
June 9, 2020

Attorneys for Respondent

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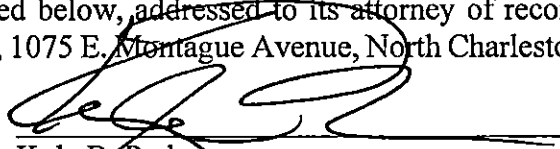
Defendants,

Of whom Gwen G. Bishop
and Cassandra Robinson are,

Appellants.

PROOF OF SERVICE

I certify that I have served a copy of the Respondent's Motion for Extension of time to file Respondent's Return to Appellant's Petition for Rehearing by mailing a copy of same via regular United States mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below, addressed to its attorney of record, Jason Scott Luck, Esq., Garrett Law Offices, 1075 E. Montague Avenue, North Charleston, South Carolina 29405.



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Thomas H. Pope III
W. Chad Jenkins
Kyle B. Parker

Thomas H. Pope
(1913-1999)
Joseph W. Hudgens
(1932-2019)

June 9, 2020

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SC Court of Appeals

VIA FACSIMILE (803-734-1839) AND US MAIL
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Robert G. Shirey v. Gwen G. Bishop, Cassandra Robinson, and TD Bank, N.A.
Court of Appeals Case No.: 2017-001678

Dear Ms. Kitchings:

Enclosed please find one (1) original and six (6) copies of the Respondent's request for an extension of ten (10) days to serve and file the Respondent's Return to Petition for Rehearing. I understand that the Supreme Court's order of March 20, 2020, remains in effect such that no motion filing fee is required. Please let me know if I am mistaken and such a fee is payable.

Should you have any questions, concerns, or require something further, please do not hesitate to contact me. With my kindest regards, I am,

Sincerely,

POPE PARKER JENKINS, P.A.


Kyle B. Parker

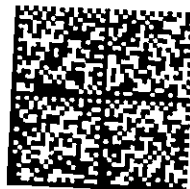
KBP/rb
Enc.

cc: Jason Scott Luck, Esq.(via email & US Mail)

**POPE
PARKER
JENKINS**

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The Honorable Jenny Abbott Kitchings JUN 11 2020
Clerk of Court

South Carolina Court of Appeals
P.O. Box 11629

Columbia, South Carolina 29211

SC Court of Appeals

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