

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

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Appellate Case No. 2019-001941

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Bank of America, N.A.

Respondent

v.

Janie C. Southern,

Appellant.

**RECEIVED**

**Aug 05 2020**

**SC Court of Appeals**

MOTION FOR ENLARGEMENT OF TIME TO FILE  
INITIAL REPLY BRIEF OF APPELLANT

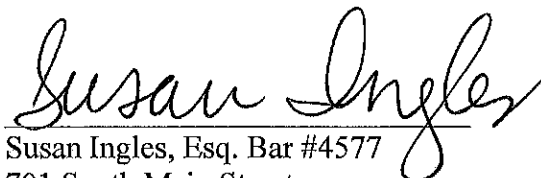
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Counsel for Appellant desires to submit an Initial Reply Brief in this appeal and has determined the need for additional time to properly prepare the Initial Reply Brief of Appellant in this case beyond the ten (10) days available under the Appellate Court Rules.

Appellant therefore requests an enlargement of time of eighteen (18) days to file an Initial Reply Brief of Appellant until August 24, 2020.

Respectfully submitted,

August 5, 2020



Susan Ingles, Esq. Bar #4577  
701 South Main Street  
Greenville, South Carolina 29601  
(864) 679-3244  
Attorney for Appellant

Other Counsel of Record:  
Salvatore Louis Schiappa III  
SC Bar No. 102134  
Cooling & Winter LLC  
220 North Main St., Suite 500  
Greenville, SC 29601  
(864) 605-3832  
Attorney for Respondent

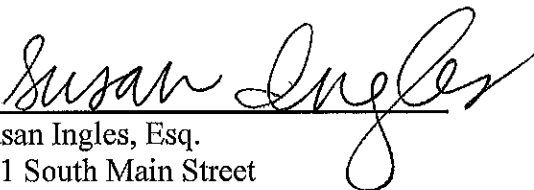
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**SC Court of Appeals**

**PROOF OF SERVICE**

I certify that I have served the following document on Bank of America, N.A. by depositing a copy in the United States Mail, postage prepaid, on August 5, 2020, addressed to its attorney of record, Salvatore Louis Schiappa III, Cooling & Winter LLC, 220 North Main St., Suite 500 Greenville, SC 29601

**MOTION FOR ENLARGEMENT OF TIME TO FILE  
INITIAL REPLY BRIEF OF APPELLANT**

August 5, 2020

  
\_\_\_\_\_  
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(864) 679-3244  
Attorney for Appellant



**South Carolina  
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August 5, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201-3726  
ATTENTION : Sierra Ritchie

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**Aug 05 2020**

**SC Court of Appeals**

Motion and Proof of Service filed VIA EMAIL  
Filing fee submitted by mail


RE: Bank of America, N.A., Respondent v. Janie C. Southern, Appellant  
Appellate Case No. 2019-001941

Dear Ms. Kitchings:

Enclosed for filing in the above referenced case are the following:

- 1) Motion For Enlargement of Time to File Initial Reply Brief Of Appellant with Proof of Service
- 2) \$50.00 filing fee

Thank you for your consideration of this Motion. Please let me know if anything further is needed in order to render a decision.

Sincerely,  
  
Susan Ingles

Encl.  
cc: Louis Schiappa

