

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Dale Van Slambrook, Master in Equity

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Appellate Case No. 2019-001572

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**RECEIVED**  
JUL 27 2020  
SC Court of Appeals

Wilmington Savings Fund Society, FSB, as  
Owner Trustee of the Residential Credit  
Opportunities Trust V-C,

Respondent,

v.

Nehemiah Bryant,

Appellant.

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**MOTION TO FILE AND SERVE  
MOTION TO DISMISS OUT OF TIME**


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Magalie A. Creech (S.C. Bar 78855)  
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Post Office Box 41489  
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mcreech@finkellaw.com  
*Attorneys for Respondent*

NOW COMES Respondent Wilmington Savings Fund Society, FSB, as owner Trustee of the Residential Credit Opportunities Trust V-C, who, by and through its undersigned counsel, respectfully moves before the Court for an extension of time in which to serve the *Respondent's Motion to Dismiss Appeal as Untimely* upon the Appellant and file the same and the accompanying *Proof of Service* with the Court. Respondent moves for the due date to be extended to Friday, July 31, 2020. Contrary to the Proof of Service filed by Appellant on March 23, 2020, the reason for the failure to timely serve and file the *Respondent's Motion to Dismiss Appeal as Untimely* and accompanying *Proof of Service* was because Respondent did not receive either the Initial Brief of Appellant, as Amended or otherwise, or the Appellant's Designation of Matter. Respondent respectfully submits that Appellant would not be prejudiced by the Court's granting this Motion.

Respectfully submitted,

FINKEL LAW FIRM LLC



Magalie A. Creech (S.C. Bar 78855)  
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July 24, 2020

THE STATE OF SOUTH CAROLINA  
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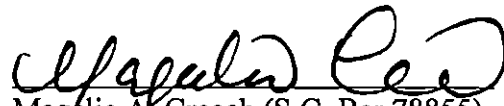
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PROOF OF SERVICE

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I certify that I have served the *Notice of Appearance for Respondent, Respondent's Motion to File and Serve Motion to Dismiss Out of Time and Respondent's Motion to Dismiss Appellant's Appeal as Untimely* by depositing a copy of same in the United States Mail, postage prepaid, on July 24, 2020, addressed to Appellant, Nehemiah Bryant, 151 Saint Johns Bethel Street, Moncks Corner, SC 29461.

FINKEL LAW FIRM LLC



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*Attorneys for Respondent*

July 24, 2020



MAGALIE A. CREECH  
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REPLY TO:  
CHARLESTON LITIGATION

July 24, 2020

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

RECEIVED  
JUL 27 2020  
SC Court of Appeals

RE: Wilmington Savings Fund v. Nehemiah Bryant  
Appellate Case No.: 2019-001572  
Our File No.: 90473.55482

Dear Ms. Kitchings:

Enclosed for filing is the *Notice of Appearance for Respondent, Respondent's Motion to File and Serve Motion to Dismiss Out of Time, Respondent's Motion to Dismiss Appellant's Appeal as Untimely* and related *Proof of Service* in the above-referenced case, along with six (6) copies, which we kindly ask you to file and return in the attached, self-addressed, stamped envelope. Enclosed also are check numbers 74408 and 74409 in the amounts of \$25.00 each for the respective motion filing fees.

Should you have any questions concerning this matter, please do not hesitate to contact our office at your earliest convenience.

With kind personal regards, we are

Yours very truly,

FINKEL LAW FIRM

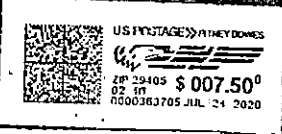
Magalie A. Creech

CC: Nehemiah Bryant

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