

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Nov 04 2020

SC Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

James O. Spence, Master-in-Equity for Lexington County

Appellate Case No. 2020-000872

Case No. 2011-CP-32-01205

First Reliance Bank, Respondent,

v.

Charles E. Bishop, Brett D. Blanks, BCM of Lexington, LLC,
and Branch Banking and Trust Company of South Carolina Defendants,

Of Whom Charles E. Bishop is the Appellant.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondent First Reliance Bank respectfully moves this Court for an extension of time to file and serve its Initial Brief and Designation of Matter.

The Respondent’s motion is based on the grounds that Counsel for Respondent requires additional time to prepare the Initial Brief and Designation of Matter due to a very active caseload complicated by the negative impacts of COVID 19, and would respectfully request an additional thirty (30) days to complete, file and serve these pleadings. This is the first request for an extension in this matter. By our calculations, the new deadline would be December 31, 2020.

WHEREFORE, the Respondent respectfully requests that it be granted an additional thirty (30) days to file its Initial Brief and Designation of Matter.

Respectfully submitted,

November 4, 2020

s/James Edward Bradley _____
James Edward Bradley, SC Bar #66130
Moore Taylor Law Firm, P.A.
P.O. Box 5709
West Columbia, SC 29171
(803) 796-9160
ward@mttlaw.com
Attorney for Respondent

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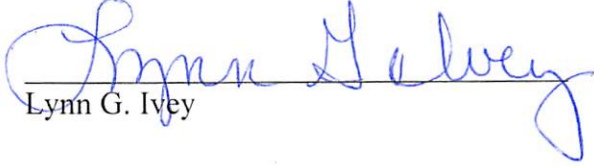
Of Whom Charles E. Bishop is the..... Appellant.

PROOF OF SERVICE

I, Lynn G. Ivey, an employee of the Moore Taylor Law Firm, P.A., certify that I have served the Respondent’s Motion for Extension of Time to File Initial Brief and Designation of Matter on the Appellant by depositing a copy of same in the United States Mail, postage prepaid and via electronic mail (email), on November 4, 2020, addressed to his attorney of record as follows:

Paul B. Ferrara, III, Esquire
8887 Old University Blvd., Suite 200
North Charleston, SC 29406
paul@ferraralawfirm.net

West Columbia, South Carolina
November 4, 2020


Lynn G. Ivey

November 4, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
VIA E-Filing

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SC Court of Appeals

S. Jahue Moore†
James Edward Bradley†
Sheila McNair Robinson
Christian G. Spradley
William H. Edwards
Stanley L. Myers
Jane H. Downey♦
S. Jahue Moore, Jr.
John C. Bradley, Jr.
Melissa K. Moore
William B. Fortino
Ralph Nichols Riley, Jr.
Lester McGill Bell, Jr.
Bryan C. Letteer
Sierra D. Carini
Nicole E. Jackson

J. Mark Taylor†
Robert D. Hazel†
C. David Sawyer, Jr.†
Billy C. Coleman
1916-2019

Re: First Reliance Bank, Respondent, v. Charles E. Bishop, Brett D. Blanks, BCM of Lexington, LLC, and Branch Banking and Trust Company of South Carolina Defendants, of Whom Charles E. Bishop is the Appellant.

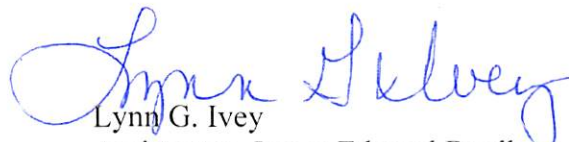
C/A No. 2020-000872

Dear Ms. Kitchings:

Please find enclosed for filing via electronic means the Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter. Also included is the Proof of Service for this document.

Thank you for your consideration and assistance with this filing.

Sincerely,


Lynn G. Ivey
Assistant to James Edward Bradley

Enclosures

cc: James Edward Bradley, Esquire
Paul B. Ferrara, III, Esquire (via email and US Mail)