

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APR 12 2021

**SC Court of Appeals**

APPEAL FROM THE BEAUFORT COUNTY  
COURT OF COMMON PLEAS

HONORABLE BROOKS P. GOLDSMITH

CASE NO.: 2018-CP-07-00409  
APPELLATE NO.: 2020-000128

Gary Victory,

Appellant,

Vs.

Wells Fargo Bank, NA and  
Mortgage Contracting Services, LLC,

Defendants.

Of Whom Mortgage Contracting Services, LLC is

Respondent.

And

Mortgage Contracting Services, LLC

Respondent,

Vs.

Ryan Davis d/b/a/ Davis Home Preservation,

Defendant.

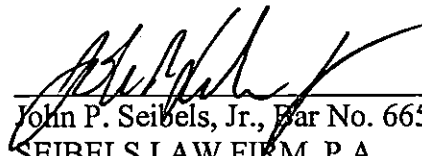
**NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME TO FILE  
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER**

John P. Seibels, Jr.  
SC Bar No. 66506  
THE SEIBELS LAW FIRM, PA  
38 Broad Street, Suite 200  
Charleston, SC 29401  
843-722-6777 (O)  
843-722-6781 (F)  
[jseibels@seibelsfirm.com](mailto:jseibels@seibelsfirm.com)  
Attorneys for Respondent

The Respondent would respectfully request an extension of time within which to file the Initial Brief of the Appellant and the Appellant's Designation of Matter to be Included in the Record on Appeal. These matters are due to be filed no later than April 19, 2021. It is accordingly respectfully requested that the Respondent be granted an extension of time in which to file the Initial Brief and Designation of Matters to be Included in the Record on Appeal until May 19, 2021.

This motion is made upon the ground that an extension as requested would be in the best interest of justice, and would not prejudice the Appellant. It is accordingly respectfully requested that the Respondent be granted until May 19, 2021 to file the Respondent's Initial Brief and the Respondent's Designation of Matter to be Included in the Record on Appeal.

THE SEIBELS LAW FIRM, PA

  
John P. Seibels, Jr., Bar No. 66506  
SEIBELS LAW FIRM, P.A.  
38 Broad Street, Suite 200  
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[mmaness@seibelsfirm.com](mailto:mmaness@seibelsfirm.com)

**Attorneys for Mortgage Contracting  
Services, LLC**

April 9, 2021.  
Charleston, South Carolina

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Respondent,

Vs.

Ryan Davis d/b/a/ Davis Home Preservation,

Defendant.

CERTIFICATE OF SERVICE


Undersigned certifies that Respondent's Notice of Motion and Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to which this certificate is affixed, was served upon the party(s) to this action by depositing a copy of same, enclosed in a first class, postpaid wrapper properly addressed to the attorney(s) of record:

James H. Moss, Esquire  
SC Bar No. 4220

MOSS, KUHN & FLEMING, PA  
1501 North Street  
Beaufort, South Carolina 29902  
[jim@mossandkuhn.com](mailto:jim@mossandkuhn.com)

Amanda K. Dudgeon, Esquire  
SC Bar No. 72516  
CHANDLER & DUDGEON, LLC  
Post Office Box 547  
Charleston, South Carolina 29402  
[mandi@chandlerdudgeon.com](mailto:mandi@chandlerdudgeon.com)

in a post office or official depository under the exclusive care and custody of the United States  
Postal Service, on April 9, 2021.

By:   
Janet B. Donahue

THE  
SEIBELS  
LAW FIRM, P.A.

38 BROAD STREET, SUITE 200  
CHARLESTON, SOUTH CAROLINA 29401

843.722.6777  
fax 843.722.6781

*John P. Seibels, Jr.*  
[jseibels@seibelsfirm.com](mailto:jseibels@seibelsfirm.com)

April 9, 2021

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

**RECEIVED**

APR 12 2021

**SC Court of Appeals**

RE: Gary Victory vs. Mortgage Contracting Services, LLC  
Case No.: 2018-CP-07-00409  
Appellate Case No.: 2020-000128

Dear Mrs. Kitchings:

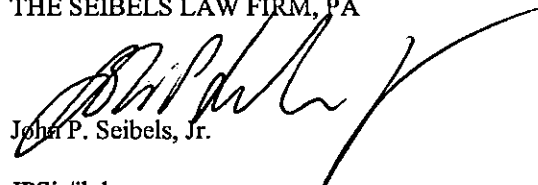
Enclosed for filing is the original and seven (7) copies of Respondent's Notice of Motion and Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter and Certificate of Service. Please file the enclosures and return a clocked copy of each to me in the enclosed self-addressed stamped envelope.

By copy of this letter, and the enclosures, I am serving a copy of the same on James H. Moss, Esquire and Amanda K. Dudgeon, Esquire.

With kind personal regards, I am

Sincerely,

THE SEIBELS LAW FIRM, PA



John P. Seibels, Jr.

JPSjr/jbd

Enclosures

Cc: James H. Moss, Esquire  
Amanda K. Dudgeon, Esquire

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SC Court of Appeals

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6431-3 0005  
Seibels Law Firm  
38 Broad Street, Suite 200  
Charleston SC 29401

[E012]

SHIP TO: 6431-3  
Clerk, South Carolina Court of Appeals  
The Honorable Jenny Abbot Kitchings  
PO Box 11629  
Columbia SC 29211-1629

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