

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUN 24 2021

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
J. Cordell Maddox Jr., Circuit Court Judge

SC Court of Appeals

Case No.: 2015-CP-04-01518
Appellate Case No. 2020-001253

Deutsche Bank National Trust
Company, as Certificate Trustee on
behalf of Bosco Credit II Trust Series
2010-1 Respondents,

v.

Doris J. Dixon and AnMed Health Defendants,
Of whom Doris J. Dixon is the Appellant.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

Sean M. Foerster (SC Bar # 77466)
ROGERS TOWNSEND LLC
1221 Main Street, 14th Floor (29201)
Post Office Box 100200
Columbia, South Carolina 29202-3200
(803) 771-7900
sean.foerster@rogerstownsend.com

Attorneys for the Respondent Deutsche Bank
National Trust Company, as Certificate Trustee on
behalf of Bosco Credit II Trust Series 2010-1

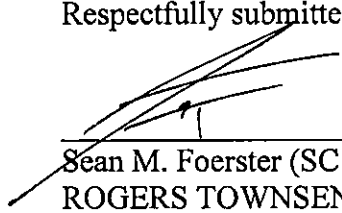
June 23, 2021

Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1 (“Respondent”) hereby moves for a 29-day extension of time to file and serve its Initial Brief of the Respondent and Designation of Matter due to its counsel’s heavy workload and due to a delay in its ability to obtain the transcripts from the lower court proceedings.

The present deadline for service and filing of Respondent’s Initial Brief and Designation of Matter is July 1, 2021. Respondent’s counsel believes that there is good cause to grant the requested extension to July 30, 2021. This extension request is unopposed by counsel for Appellant Doris J. Dixon. (See Email of June 8, 2021, filed herewith as Exhibit 1.)

WHEREFORE, Respondent prays for an Order extending the time in which to serve and file Respondent’s Initial Brief for an additional 29 days, or until to July 30, 2021.

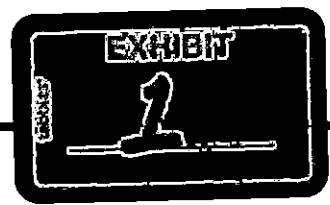
Respectfully submitted,



Sean M. Foerster (SC Bar # 77466)
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Attorneys for the Respondent Deutsche Bank National Trust Company, as Certificate Trustee on behalf of Bosco Credit II Trust Series 2010-1

June 24, 2021



From: Howard Anderson <howard@hwalawfirm.com>
Sent: Tuesday, June 8, 2021 8:10 AM
To: Sean Foerster
Subject: Doris Dixon
Attachments: 2016-05-16 Hearing.pdf; 2017-06-13 Supplemental Hearing.pdf; 2017-12-04 Supplemental Hearing.pdf; 2016-10-12 supplemental hearing.pdf; 2015-11-23 Hearing.pdf

****External Email****

Sean:

I understand that you have not been able to get in contact with the court reporter to get the transcripts. Attached are electronic copies.

If you need an extension on your brief, you can indicate the extension is unopposed.

Best,
Howard

--

Howard W. Anderson III
*Licensed in AK, GA, IL, IN, NC, SC, TN, & VA

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Doris J. Dixon and AnMed Health Defendants,
Of whom Doris J. Dixon is the Appellant.

PROOF OF SERVICE

I HEREBY CERTIFY that I have served the Respondent's Motion for Extension of Time on June 24, 2021, by depositing a copy in the United States Mail, postage pre-paid, addressed to the following party of record:

Howard W. Anderson, III, Esquire
Law Office of Howard W. Anderson III, LLC
P.O. Box 661
Pendleton, SC 29670

William E. Phillips, Esquire
P.O. Box 4210
Anderson, SC 29622


Tiffany Cooper
Legal Assistant to Sean M. Foerster
ROGERS TOWNSEND LLC

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SEAN M. FOERSTER, ESQUIRE
MEMBER
SEAN.FOERSTER@ROGERSTOWNSEND.COM
D 803.744-1855
F 803.343.7017

LICENSED IN SOUTH CAROLINA



June 24, 2021

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court for the South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

RE: *Deutsche Bank National Trust Company, as Certificate trustee on behalf of
Bosco Credit II Trust Series 2010-1 v. Doris J. Dixon; Anmed Health*
Appellate Case No. 2020-001253
Our File #: 510023.00200

Dear Ms. Kitchens:

Enclosed are the original and seven copies of Respondent's Motion for Extension of Time and a Proof of Service in reference to the above matter, along with a check in the amount of \$50.00.

By copy of this correspondence, I am serving a copy of this motion on the Appellant.

At your convenience, please return a filed copy of this document to me in the enclosed prepaid envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "S. M. Foerster", is written over a horizontal line.

Sean M. Foerster

/SMF
Enclosures

cc:

Howard W. Anderson, III, Esquire
Law Office of Howard W. Anderson III, LLC
P.O. Box 661
Pendleton, SC 29670

William E. Phillips, Esquire
P.O. Box 4210
Anderson, SC 29622