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THE STATE OF SOUTH CAROLINA

SEP 07 2021

In The Court of Appeals

SC Court of Appeals

**APPEAL FROM GREENVILLE COUNTY
Greenville County Court of Common Pleas
PERRY H. GRAVELY, GREENVILLE CIRCUIT COURT JUDGE**

**Appellate Case No. 2020-04644
Trial Court Case No. 2021-000265**

Sula Adams.....**Appellant,**

vs.

PennyMac Loan Services, LLC, The United States of America, acting by and through its
Agency, The Secretary of Housing and Urban Development, Lanier Law Firm,
LLC, Abby Robertson and Investors Title Insurance Company,
.....**Respondents.**

**MOTION FOR An "EXTENSION" FOR NINETY DAYS BEFORE
APPELLANT'S INITIAL BRIEF IS DUE**

The Appellant moves this Court for an Order for an "Extension" of at least
Ninety (90) days before the Appellant's Initial Brief is due..

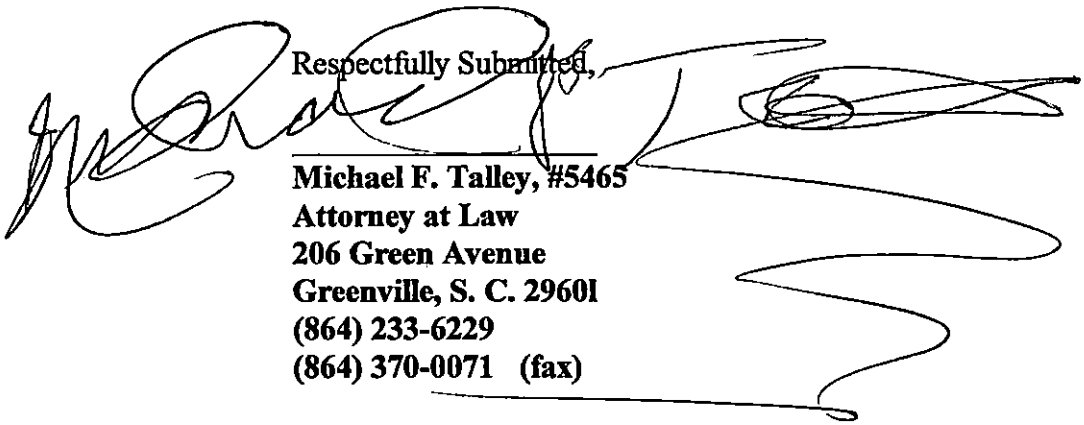
1. That the Appellant's below signed attorney, Michael F. Talley, under went
CATARACT SURGERY on his left eye on or about May 26, 2021 and a second
CATERACT SURGERY on his right eye on June 9, 2021 at Clemson eye Clinic and
unfortunately, said attorney experienced problems with both eyes for **MONTHS**
thereafter. Further, said attorney was hospitalized twice around the same time for
several days. Due to these medical problems, said attorney was prevented from

timely submitting his Appellant's Initial Brief.

That since it would take at least **A MONTH OR TWO** to submit this Initial Brief, it would appear this said attorney should be granted a reasonable **"EXTENSION"** to prepare and submit his Initial **"Appellant's Brief"** and it would appear that this said Appellate court need to review this said matter and grant this below Appellant's attorney a reasonable **"EXTENSION"** of several months to submit his Appellant's **INITIAL** Brief..

WHEREFORE, this Appellant prays for this Court to review and grant this said Appellant's attorney a reasonable **"EXTENSION"** of several months in which to submit his Initial Appellan's Brief.

Respectfully Submitted,



Michael F. Talley, #5465
Attorney at Law
206 Green Avenue
Greenville, S. C. 29601
(864) 233-6229
(864) 370-0071 (fax)

Dated: August 31, 2021

Attorney for Appellant

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Greenville County Court of Common Pleas
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Trial Case No. 2020-04644
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Sula Adams.....Appellants,

v.

PennyMac Loan Services, LLC, The United States of America, acting by and through
Its Agency, The Secretary of Housing and Urban Development, Lanier Law Firm,
LLC, Abbey Robertson, and Investors Title Insurance Company.

.....Respondents

PROOF OF SERVICE

I certify that I, as the Appellants' undersigned attorney, have served a copy
of the Appellants' Proof of Service that the Appellant's Motion For an Extension
to file the Appellant's Initial Brief has been served upon the Respondents, PennyMac
Loan Sevices, LLC et. al., by depositing a copy (ies) of same in the United
States Mail, postage pre-paid, on August 31, 2021, addressed to the Respondents;
attorneys of record for this appeal listed on the enclosed filed Amended Notiice of Appeal.

[Handwritten signature of Michael F. Talley]

Michael F. Talley, #5465
206 Green Avenue
Greenville, S.C. 29601
(864) 233-6229
(864) 370-0071 (fax)

Dated: August 31, 2021

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MICHAEL F. TALLEY
Attorney at Law
206 Green Avenue
Greenville, South Carolina 29601
Across from Greenville High School
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Fax: 864-370-0071

August 31, 2021

Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
1220 Senate Street
Columbia, S. C. 29211

RE: Sula Adams, Appellant, vs. PennyMac, et. al., Respondents
Appellate Case No. 2021-00265

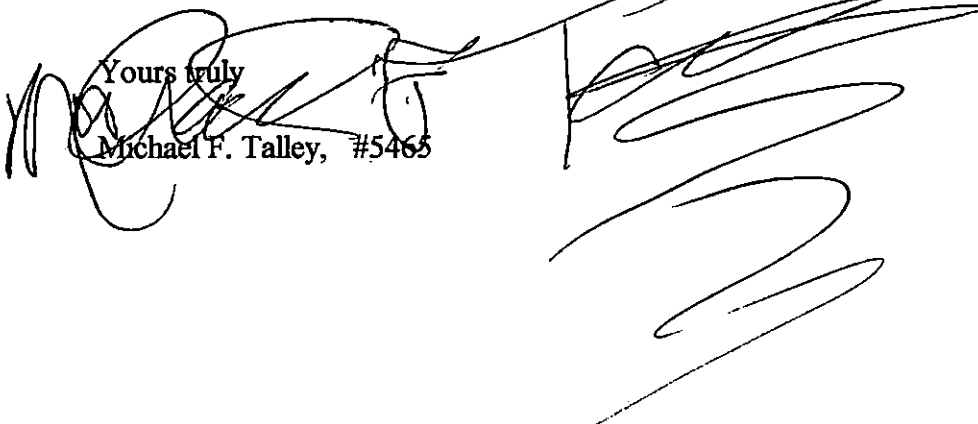
Dear Clerk or Deputy Clerk:

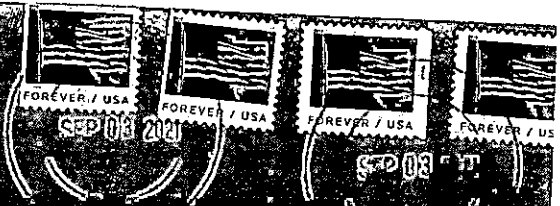
Enclosed please find the original and Six (6) copies of the Appellant's Motion for an "Extension": for filing on behalf of the Appellant, Sula Adams, along with our check for \$50.00 and two (2) copies of our Proof of Service upon the Respondents' attorneys, listed on the enclosed Notice of Amended Notice of Appeal.

After filing, please forward our office a filed copy of our Proof of Service in the enclosed self-addressed-stamped envelope.

Thank you.

MFT/
Enclosures:
cc: Respondents' Attorneys

Yours truly

Michael F. Talley, #5465



Mr. Michael F. Talley, LLC
Attorney at Law
206 Green Avenue
Greenville, S. C. 29601

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