

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Frank R. Addy, Jr., Circuit Court Judge

Appellate Case No. 2013-000560

RECEIVED

APR 10 2013

SC Court of Appeals

Glenn Allen Mitchum.....Appellant,

v.

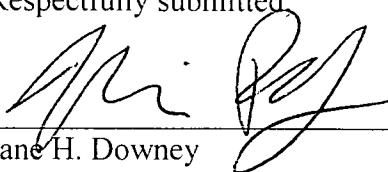
The Bank of New York Mellon Trust
Company, National Association as grantor
Trustee of the Protium Master Grantor Trust,.....Respondents.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for Appellant, hereby moves for an extension of the deadline for serving and filing the Appellant's Reply to Respondents' Motion to Dismiss. This Reply was originally due to be filed by Appellant on April 11, 2013.

At present, counsel is under an unusually heavy schedule in his practice, and will be unable to complete these documents by the April 11th deadline. This is the Appellant's first request for an extension of time. Accordingly, counsel respectfully moves for a ten day extension in which to file the Appellant's Reply to Respondents' Motion to Dismiss on April 21, 2013.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'Jane H. Downey', is written over a horizontal line.

Jane H. Downey
M. Brooks Biediger
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1700 Sunset Boulevard
P.O. Box 5709
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Counsel for Appellant

West Columbia, South Carolina

April 10, 2013.

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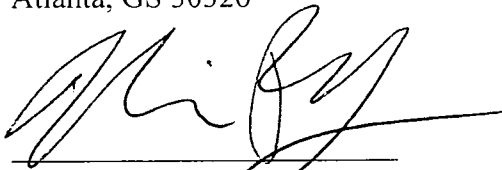
PROOF OF SERVICE

I certify that I served the Motion for Extension, by mail, postage prepaid, to
Respondents' counsel on April 10, 2013, to:

Brian Steed Tatum
Tatum Law Firm, PLLC
P.O. Box 11250
Charlotte, NC 28220

January Nicole Taylor
Brock and Scott, PLLC
3455 Peachtree Road NE, 5th Floor
Atlanta, GS 30326

April 10, 2013.



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April 10, 2013

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V. Claire Allen, Deputy Clerk
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211


RE: Glenn Allen Mitchum v. Bank of New York Mellon Trust
Appellate Case No. 2013-000560

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Dear Ms. Allen:

This law firm represents Glenn Allen Mitchum in the above-referenced case. You will find enclosed for filing the original and six (6) copies of a Motion for Extension of Time and Proof of Service with regard to the above-referenced matter. Please file the original and return the other copies as "clocked-in" with the enclosed self-addressed, stamped envelope. Thank you for your assistance and cooperation in this matter.

Respectfully Yours,
MOORE, TAYLOR, & THOMAS, P.A.


Corey Savage
Paralegal to Jane H. Downey and
M. Brooks Biediger

Enclosures

cc w/ encl: Brian Steed Tatum, Esquire
January Nicole Taylor, Esquire