

**RECEIVED**

**Oct 13 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
The Honorable L. Casey Manning

---

Circuit Court Case No. 2015-CP-40-07268  
Appellate Case No. 2021-00898

---

Jimmy Helms.....Respondent,

v.

Debbie Willing, .....Appellant.

---

**APPELLANT’S FIRST REQUEST FOR EXTENSION**

---

On September 27, 2021, Appellant Debbie Willing filed a Motion to Enforce the Automatic Stay, and also requested that filing deadlines would be stayed pending the disposition of the Motion by this Court. The Court has not yet ruled upon that Motion. However, Appellant’s Initial Brief and Designation of Matter for the Record on Appeal is due to be filed on October 14, 2021.

Appellant respectfully requests that she be given a 30-day extension, running from the date that the Court of Appeals rules on the Motion to Enforce the Automatic Stay, in which to file her Initial Brief and Designation of Matter for the Record on Appeal.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/Ainsley F. Tillman

Ainsley F. Tillman

[Ainsley.Tillman@FordWallace.com](mailto:Ainsley.Tillman@FordWallace.com)

Ian S. Ford

[Ian.Ford@FordWallace.com](mailto:Ian.Ford@FordWallace.com)

715 King Street

Charleston, South Carolina 29403

(843) 277-2011

*Attorneys for Appellant Debbie Willing*

Charleston, South Carolina

October 13, 2021

**RECEIVED**

**Oct 13 2021**

**SC Court of Appeals**

**Certificate of Service**

I certify that I served the within Motion for Extension on counsel for Respondent by sending a copy of the same to Respondent's attorney of record, S. Jahue Moore, at his email address listed with the AIS, contemporaneously with the electronic filing of this Motion.

s/Ainsley F. Tillman