

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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S.C. SUPREME COURT

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
The Honorable R. Keith Kelly

Supreme Court Case No. 2021-001339
Appellate Case No. 2018-00568
Case No.: 2017-CP-42-02834

Phillip Francis Luke Hughes, on behalf of the Estate of Jane K. Hughes.....Petitioner

v.

Bank of America National Association.....Respondent.

**RESPONDENT’S MOTION FOR EXTENSION OF TIME TO FILE RETURN TO
PETITIONER’S PETITION FOR A WRIT OF CERTIORARI**

RESPONDENT, Bank of America National Association (“Bank of America, N.A.” or “Bank of America”) pursuant to Rules 240 and 242 of the South Carolina Appellate Court Rules, hereby moves this Honorable Court for an additional twenty (20) days to and including January 5, 2022, to file Respondent’s Return to Petitioner’s Petition for Writ of Certiorari.

In support of its motion, Respondent respectfully shows this Honorable Court that Respondent’s Return to Petitioner’s Writ of Certiorari is due on December 16, 2021. Due to the holidays and deadlines on other matters, Respondent respectfully requests twenty additional days to file its Return to Petitioner’s Petition for a Writ of Certiorari.

Respondent’s counsel has conferred with Petitioner’s counsel, Michael Kelly, via phone on December 6, 2021, who has consented to the relief sought in this motion.

A proposed Order accompanies this motion.

December 7, 2021

Respectfully submitted,



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