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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM MARION COUNTY
Court of Common Pleas

THOMAS A. RUSSO, CIRCUIT COURT JUDGE

Appellate Case No. 2021-001049

Anderson Brothers Bank,..... Respondent,

v.

Dazarhea Monique Parson, a/k/a Dazarhea D. Parson, a/k/a Dazarhea Monique Parson,
A. Tyrone Parson, Jr. a/k/a Arnold Tyrone Parson, Jr., South Carolina Department of
Revenue and South Carolina Department of Motor Vehicles,

Of Whom Dazarhea Monique Parson, a/k/a Dazarhea D. Parson,
a/k/a Dazarhea Monique Parson and A. Tyrone Parson, Jr. a/k/a Arnold Tyrone Parson,
Jr. are Appellants.

**RESPONDENT ANDERSON BROTHERS BANK'S MOTION FOR AN
EXTENSION AND
FOR LEAVE TO FILE OUT OF TIME**

Respondent Anderson Brothers Bank (“ABB”), pursuant to Rule 240, SCACR, respectfully moves for an extension of time in which to file its return to the Petition for Writ of Certiorari (the “Petition”) filed by Appellants Dazarhea Monique Parson, a/k/a Dazarhea D. Parson, a/k/a Dazarhea Monique Parson and A. Tyrone Parson, Jr. a/k/a Arnold Tyrone Parson, Jr. (“the Parsons”). Additionally, ABB requests leave to file its return to the Petition out of time because of inadvertent oversight discovered today, December 8, 2021. Therefore, ABB respectfully requests entry of an order allowing it to file its return to the Petition on or before twenty (20) days after the Court’s ruling on this Motion, or such shorter extended period the Court may grant.

In support of this motion, ABB would state as follows:

1. On May 19, 2021, the South Carolina Court of Appeals entered its Order in Appellate Case No. 2018-002061, affirming the trial court’s decision to deny the Parsons’ petition for relief pursuant to Rule 60(b)(4) of the South Carolina Rules of Civil Procedure. This Order was the latest in a long line of Orders entered by the Court of Appeals and Supreme Court denying relief sought by the Parsons related to ABB since 2013.
2. On June 2, 2021, the Parsons filed their Petition for Rehearing with the Court of Appeals. The Court of Appeals denied this petition by Order filed on August 23, 2021.
3. On September 23, 2021, the Parsons filed the instant Petition with the Court. After the Court denied the Parsons’ motion to proceed in *forma pauperis* by Order entered on October 14, 2021, the Parsons paid the \$250.00 filing fee for their Petition around

October 26, 2021, and the Court sent correspondence notifying the parties of its receipt of the fee on October 26, 2021.

4. Pursuant to Rule 242(f), SCACR, ABB's return to the Petition was due on November 29, 2021. This deadline was missed due to inadvertent oversight that the undersigned discovered today, December 8, 2021.

5. Upon discovering this deadline, additional time is needed for ABB to file its return to the Petition due to the press of deadlines and obligations in other cases. The undersigned will make this her top priority to file if the Court grants this Motion.

9. In light of the foregoing circumstances, ABB respectfully asks the Court to enter an order (a) granting leave to file its return to the Petition out of time; and (b) setting a deadline of on or before twenty (20) days after the Court's ruling on this Motion, or such shorter extended period the Court may grant.

10. Undersigned counsel certifies that this extension is sought in good faith and not for purposes of delay.

Respectfully submitted,

s/Suzanne Taylor Graham Grigg

Suzanne Taylor Graham Grigg (S.C. Bar No. 70681)

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December 8, 2021
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