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Dec 13 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Supreme Court

ON PETITION FOR WRIT OF CERTIORARI TO THE COURT OF APPEALS

Appellate Case No. 2021-001292

Deutsche Bank National Trust Company, as Trustee for NovaStar Mortgage Funding Trust, Series 2007-1 NovaStar Equity Loan Asset Backed Certificates, Series 2007-1,.....Respondent,

v.

The Estate of Patricia Ann Owens Houck; Tammy M. Bailey; South Carolina Department of Motor Vehicles, Defendants,

Of whom the Estate of Patricia Ann Owens Houck and Tammy M. Bailey are the.....Petitioners.

MOTION FOR EXTENSION OF TIME TO SERVE AND FILE REPLY TO RETURN TO PETITION FOR WRIT OF CERTIORARI TO THE COURT OF APPEALS

Andrew S. Radeker
S.C. Bar No. 73743
Sarah M. Larabee
S.C. Bar No. 105298
Harrison, Radeker & Smith, P.A.
Post Office Box 50143
Columbia, South Carolina 29250
(803) 779-2211
drew@harrisonfirm.com
sarah@harrisonfirm.com
Attorneys for Petitioners

Petitioners hereby move pursuant to Rule 263(b), SCACR, for a 10-day extension of the time to serve and file their reply to the return to their petition for a writ of certiorari in this case. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The reply to return is due today, December 13, 2021.
2. The undersigned counsel have a jury trial starting today. In preparing for that trial and dealing with other matters of their law practice, they have not had the time to prepare a reply to the return.
3. Petitioners believe there is good cause to grant the requested extension.
4. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Petitioners pray for a 10-day extension of the time to serve and file their reply to the return to their petition for a writ of certiorari in this case.

Respectfully submitted,

/s/ Andrew S. Radeker
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Sarah M. Larabee
S.C. Bar No. 105298
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The Estate of Patricia Ann Owens Houck; Tammy M. Bailey; South Carolina Department of Motor Vehicles, Defendants,

Of whom the Estate of Patricia Ann Owens Houck and Tammy M. Bailey are the.....Petitioners.

PROOF OF SERVICE

I certify that I have served the foregoing motion for extension of time on the date given below by emailing it to opposing counsel at the addresses noted below.

G. Benjamin Milam, Esq., at bmilam@bradley.com
Jonathan E. Schulz, Esq., at eschulz@bradley.com
Mary R. Powers, Esq., at mpowers4162005@yahoo.com

Respectfully submitted,

/s/ Andrew S. Radeker
Andrew S. Radeker
S.C. Bar No. 73743
Attorney for Petitioners

December 13, 2021