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**May 31 2022**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

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Trial Case No. 2020-04644  
Appellate Case No. 2021-000265

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Sula Adams, Appellant,

v.

PennyMac Loan Services, LLC; The United States of America, acting by and through its agency, The Secretary of Housing and Urban Development; Lanier Law Firm, LLC; Abby Robertson; Investors Title Insurance Company; TransUnion; Experian Information Solutions, Inc.; and Equifax, LLC, Defendants.

Of whom PennyMac Loan Services, LLC; The United States of America, acting by and through its agency, The Secretary of Housing and Urban Development; Lanier Law Firm, LLC; Abby Robertson; and Investors Title Insurance are the Respondents.

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**MOTION FOR AN EXTENSION TO FILE THE RECORD ON APPEAL**

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The Appellant moves this Court for an Order for an Extension of Time to File the Record on Appeal on the following grounds:

1. That the Appellant's prior counsel, Attorney Michael F. Talley, passed away unexpectedly in February of this year. Appellant's current counsel, Michanna Talley Tate, has now taken over the case. However, she could not do so until she left her position as Upstate Prosecutor for the South Carolina Department of Public Safety. As such, a Notice of Appearance on behalf of Appellant was not filed until on or about March 23, 2022. Appellant's counsel needed time to

become familiar with this matter as well as other matters in Michael F. Talley's office.

That due to the information provided herein, the Record of Appeal has yet to be filed, but given an extension, said Record will be filed with this Court.

WHEREFORE, this Appellant prays for this Court to grant her an extension of time for the appellant to file the Record on Appeal and to grant such further relief that is deemed appropriate.

Respectfully submitted,

*s/Michanna Talley Tate*  
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*Attorney for Appellant*

Dated: May 31, 2022

Other Counsel of Record:

Jason Alexander Richardson, Esq.  
Matthew Douglas Patterson, Esq.  
*Attorneys for Respondent PennyMac Loan Services, LLC*

Matthew Holmes Henrikson, Esq.  
*Attorney for Respondents Lanier Law Firm, LLC and Abby Robertson*

Demetri K. Koutrakos, Esq.  
*Attorney for Respondent Investors Title Insurance Company*

Rita Bolt Barker, Esq.  
*Attorney for Respondent Equifax, LLC*

Andrew Robert de Holl, Esq.  
*Attorney for Respondent USA/HUD*