

COURT OF COMMON PLEAS
WASHINGTON COUNTY, OHIO

WELLS FARGO BANK,

Plaintiff,

Case No. 13 FR 168

Judge LANE

vs.

SHIRLEY WILSON, et al,

MOTION FOR SIXTY DAY
EXTENSION OF TIME TO
ANSWER

Defendants.

Now come the Defendant and moves this Court for a sixty-day extension of time to answer for the reasons set forth below.

SHIRLEY E. WILSON
Defendant
711 Belrock Avenue, Apt. 117
Belpre, Ohio 45714

MEMORANDUM IN SUPPORT

The Defendant Shirley E. Wilson is a widow and the Defendant, Carlton J. Wilson, is her now-deceased husband. Shirley Wilson and her now-deceased husband signed a reverse mortgage with Wells Fargo with the understanding that if they could no longer live there, they could simply turn the keys over to Wells Fargo and they would own the house. After her husband passed away, Shirley Wilson decided she could no longer live in the home and keep it up and turned it over to Wells Fargo. Shirley Wilson does not object to Wells Fargo having the home and/or selling it but she believes she should not be responsible for any deficiency.

An additional sixty days is needed to allow time for the parties to see if this can be resolved without further action. If the Plaintiff agrees that the Defendant is not responsible for a deficiency judgment, then the Defendant would be willing to sign whatever paperwork is needed to have this foreclosure completed.

For these reasons, the Defendant(s) request a sixty-day extension of time to file an answer.

SHIRLEY E. WILSON

PROOF OF SERVICE

I hereby certify that I mailed a copy of the foregoing Motion for 60 day Extension by ordinary US Mail this _____ day of _June____, 2013 to:

Lorelei C. Bolohan
Attorney for Plaintiff
Lerner Sampson & Rothfuss
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SHIRLEY E. WILSON

File the signed original with the Court as soon as possible, make enough copies to mail to the others and keep one copy for yourself

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ENTRY ON SIXTY DAY
EXTENSION OF TIME

Defendants.

This matter came on to be heard on Defendant Shirley Wilson's Motion for Extension of Time. Upon consideration of the motion, the Court finds that the Defendant's motion is well taken.

IT IS THEREFORE ORDERED that the Defendants are granted a sixty-day extension of time to answer until _____.

JUDGE

SUBMITTED BY:

SHIRLEY E. WILSON

Submit this Entry and 4 copies to the Court to review and sign if granted