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Apr 17 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Bentley D. Price, Circuit Court Judge

Case No. 2012-CP-10-000580

Thomas H. MorganRespondent,

v.

John L. Gilbert, Stuart L. Fred, Bella Vista Partnership, A Texas General Partnership, Bomasada Group, Inc., A Texas Corporation, Bomasada Investment Group II, LLC, A Texas Limited Liability Company, Lauralis Management, Inc., A Texas Corporation, and 150 Bee Street, LLC, A South Carolina Limited Liability Company, Defendants,

Of which John L. Gilbert, Stuart L. Fred, Bella Vista Partnership, A Texas General Partnership, Bomasada Group, Inc., A Texas Corporation, Bomasada Investment Group II, LLC, A Texas Limited Liability Company, and Lauralis Management, Inc., A Texas Corporation are the Appellants.

PROOF OF SERVICE

I do hereby certify that on the 17th day of April 2025, I served a copy of the within *Appellants' Reply to Respondent's Motion to Lift Stay* on all counsel of record via electronic mail addressed as follows, as evidenced by Exhibit "A" attached hereto.

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Attorneys for Appellants

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April 17, 2025

Charleston, South Carolina

EXHIBIT “A”

From: [Casey, Carol](#)
To: andy@austengowder.com; mike@mikeroselawfirm.com
Cc: [Grimball, Henry](#); [Ellison, Morris](#); [DeHart, Rhett](#); [Tillman, Matthew](#); [Bailey, Anne](#); chris@chrisstaubes.com
Subject: Thomas H. Morgan v. John Gilbert- 2024-000322 Appellants' Reply to Respondent's Motion to Lift Stay - 1 of 3
Date: Thursday, April 17, 2025 1:57:24 PM
Attachments: [Appellants' Reply to Respondent's Motion to Lift Stay.pdf](#)
[Exhibits 1-4 to Appellants' Reply to Respondent's Motion to Lift Stay.pdf](#)

Attached for service, please find Appellants' Reply to Respondent's Motion to Lift Stay and Exhibits 1 – 4 to the Reply. There are a total of 12 exhibits to the Reply; we are serving them in three parts as the size of the 12 exhibits combined was too large to attach to one email. Exhibits 5 – 12 will be sent in separate emails to follow.

Kind regards,
Carol

From: [Casey, Carol](#)
To: andy@austengowder.com; mike@mikeroselawfirm.com
Cc: [Grimball, Henry](#); [Ellison, Morris](#); [DeHart, Rhett](#); [Tillman, Matthew](#); [Bailey, Anne](#); chris@chrisstaubes.com
Subject: Thomas H. Morgan v. John Gilbert- 2024-000322 Appellants" Reply to Respondent"s Motion to Lift Stay - 2 of 3 (Exhibits 5- 9)
Date: Thursday, April 17, 2025 2:03:29 PM
Attachments: [image277816.png](#)
[image302142.png](#)
[image473004.png](#)
[image312542.png](#)
[Exhibits 5-9 to Appellants" Reply to Respondent"s Motion to Lift Stay.pdf](#)

Attached for service, please find Exhibits 5-9 to Appellants' Reply to Respondent's Motion to Lift Stay. Exhibits 10-12 will follow.

Kind regards,
Carol

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Cc: [Grimball, Henry](#); [Ellison, Morris](#); [DeHart, Rhett](#); [Tillman, Matthew](#); [Bailey, Anne](#); chris@chrisstaubes.com
Subject: Thomas H. Morgan v. John Gilbert- 2024-000322 Appellants" Reply to Respondent"s Motion to Lift Stay - 3 of 3 (Exhibits 10-12)
Date: Thursday, April 17, 2025 2:07:42 PM
Attachments: [image208688.png](#)
[image882219.png](#)
[image791755.png](#)
[image301651.png](#)
[Exhibits 10-12 to Appellants" Reply to Respondent"s Motion to Lift Stay.pdf](#)

Attached for service, please find Exhibits 10-12 to Appellants' Reply to Respondent's Motion to Lift Stay.

Kind regards,
Carol

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