



**May 1, 2025**

Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Womble Bond Dickinson (US) LLP

Post Office Box 999  
Charleston, SC 29402

5 Exchange Street  
Charleston, SC 29401

**Re: Thomas H. Morgan v. John L. Gilbert, et. al.  
Appellate Case No. 2024-000322**

Henry Grimball  
Partner  
Direct Dial: 843-720-4615  
Direct Fax: 843-410-2315  
E-mail: [Henry.Grimball@wbd-us.com](mailto:Henry.Grimball@wbd-us.com)

Dear Ms. Kitchings:

As counsel for the Appellants, I am writing to note for the record that Appellants filed their Return to Respondent's Motion to Lift Stay with your office on April 17, 2025, (See Exhibit 1 hereto). As we read Rule 240(f) SCACR, the Respondent as moving party had five (5) days from the date of service of our Return, April 17, to file Respondent's Reply.

Contrary to Rule 240(f) SCACR, Respondent did not file his Reply ["Rebuttal"] until April 30, 2025.

Please bring this to the attention of the Court.

**Womble Bond Dickinson (US) LLP**

/s/ Henry E. Grimball  
Henry E. Grimball, S.C. Bar No. 2313  
5 Exchange St. (29401)  
P.O. Box 999  
Charleston, SC 29402  
(843) 722-3400  
Attorney for Appellants

cc: W. Andrew Gowder, Jr.  
Michael T. Rose  
Attorneys for Respondent

**RECEIVED**  
**May 01 2025**  
**SC Court of Appeals**

## Grimball, Henry

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**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Thursday, April 17, 2025 3:23 PM  
**To:** Casey, Carol; Court Of Appeals Filings  
**Cc:** Grimball, Henry; Ellison, Morris; Tillman, Matthew; DeHart, Rhett; Andy Gowder; mike@mikeroselawfirm.com; bailey@austengowder.com; chris@chrisstaubes.com  
**Subject:** RE: Thomas H. Morgan v. John Gilbert- 2024-000322 - Proof of Service - Appellants' Reply to Respondent's Motion to Lift Stay  
**Attachments:** Morgan v. Gilbert - POS.pdf

External (ctappfilings@sccourts.org)

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Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Casey, Carol <Carol.Casey@wbd-us.com>  
**Sent:** Thursday, April 17, 2025 3:19 PM  
**To:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Grimball, Henry <Henry.Grimball@wbd-us.com>; Ellison, Morris <Morris.Ellison@wbd-us.com>; Tillman, Matthew <Matthew.Tillman@wbd-us.com>; DeHart, Rhett <M.Rhett.DeHart@wbd-us.com>; Andy Gowder <andy@austengowder.com>; mike@mikeroselawfirm.com; bailey@austengowder.com; chris@chrisstaubes.com  
**Subject:** Thomas H. Morgan v. John Gilbert- 2024-000322 - Proof of Service - Appellants' Reply to Respondent's Motion to Lift Stay

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Attached for filing, please find Proof of Service of Appellants' Reply to Respondent's Motion to Lift Stay.

Thank you,  
Carol Casey

**Carol Casey**  
Paralegal  
Womble Bond Dickinson (US) LLP

d: 843-720-4671  
m: 843-814-7458  
e: [Carol.Casey@wbd-us.com](mailto:Carol.Casey@wbd-us.com)

5 Exchange Street  
PO Box 999 (29402)  
Charleston, SC 29401

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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

Bentley D. Price, Circuit Court Judge

Case No. 2012-CP-10-00580

Thomas H. Morgan .....Respondent,

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.

APPELLANTS' REPLY TO RESPONDENT'S MOTION TO LIFT STAY

WOMBLE BOND DICKINSON (US) LLP  
/s/ Henry E. Grimball  
Henry E. Grimball, S.C. Bar No. 2313  
Morris A. Ellison, S.C. Bar No. 1881  
5 Exchange Street (29401)  
P.O. Box 999  
Charleston, SC 29402  
(843) 722-3400

Attorneys for Petitioners  
[Except 150 Bee Street, LLC]

**Grimball, Henry**

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**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Wednesday, April 30, 2025 3:51 PM  
**To:** Bailey Pope; Court Of Appeals Filings  
**Cc:** Andy Gowder; Ellison, Morris; Grimball, Henry  
**Subject:** RE: Case No. 2024-000322: Respondent's Rebuttal Brief, Verification, and Supplemental Affidavit  
**Attachments:** Morgan v. Gilbert - Reply to the Return.pdf

External (ctappfilings@sccourts.org)

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Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

**From:** Bailey Pope <bailey@austengowder.com>  
**Sent:** Wednesday, April 30, 2025 3:46 PM  
**To:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Andy Gowder <andy@austengowder.com>; Ellison, Morris <morris.ellison@wbd-us.com>; Grimball, Henry <Henry.Grimball@wbd-us.com>  
**Subject:** FW: Case No. 2024-000322: Respondent's Rebuttal Brief, Verification, and Supplemental Affidavit

\*\*\* **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Good afternoon,

Attached for filing, please find the Respondent's Rebuttal Brief in Support of the Motion to Lift Stay, Verification for the Motion to Lift Stay, and Supplemental Affidavit and Exhibits in Support of the Motion to Lift Stay in the above-referenced case. I have also attached the corresponding Certificate of Service.

Thank you and please let me know if anything further is needed!

Bailey Pope  
Paralegal to W. Andrew Gowder Jr.  
**Austen & Gowder, LLC**  
P.O. Box 20820  
Charleston, SC 29413

1629 Meeting Street, Suite A  
Charleston, South Carolina 29405

843.727.2215

[bailey@austengowder.com](mailto:bailey@austengowder.com)

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**From:** Bailey Pope <[bailey@austengowder.com](mailto:bailey@austengowder.com)>  
**Date:** Wednesday, April 30, 2025 at 3:44 PM  
**To:** Ellison, Morris <[morris.ellison@wbd-us.com](mailto:morris.ellison@wbd-us.com)>, Grimball, Henry <[Henry.Grimball@wbd-us.com](mailto:Henry.Grimball@wbd-us.com)>  
**Cc:** Andy Gowder <[andy@austengowder.com](mailto:andy@austengowder.com)>  
**Subject:** Case No. 2024-000322: Respondent's Rebuttal Brief, Verification, and Supplemental Affidavit

Good afternoon,

Attached for service, please find the Respondent's Rebuttal Brief in Support of the Motion to Lift Stay, Verification for the Motion to Lift Stay, and Supplemental Affidavit and Exhibits in Support of the Motion to Lift Stay in the above-referenced case. I have also attached the corresponding Certificate of Service.

Best,

Bailey Pope  
Paralegal to W. Andrew Gowder Jr.  
**Austen & Gowder, LLC**  
P.O. Box 20820  
Charleston, SC 29413

1629 Meeting Street, Suite A  
Charleston, South Carolina 29405

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