

**STATE OF SOUTH CAROLINA  
IN THE  
COURT OF APPEALS**

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Appeal from the Court of Common Pleas  
For Charleston County  
Honorable Jennifer B. McCoy, Circuit Judge  
Civil Action No.: 2012-CP-10-00580  
***Appellate Case No. 2025-002323***

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**RECEIVED**

**Dec 04 2025**

**SC Court of Appeals**

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 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, are the

Appellants.

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**MOTION FOR EXTENSION OF TIME  
IN WHICH TO RESPOND TO  
RESPONDENT'S MOTION TO DISMISS APPEAL**

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*Attorneys for the Appellants,*

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

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS:

COMES NOW the Appellants, Stuart L. Fred, Bella Vista Partnership, a Texas General Partnership; Bomasada Group, Inc., a Texas Corporation; Bomasada Investment Group II, a Texas Limited Liability Company; Lauralis Management, Inc., a Texas Corporation; and 150 Bee Street, LLC, a South Carolina Limited Liability Company, pursuant to Rule 240 of the South Carolina Appellate Court Rules, and respectfully requests this Court of Appeals to grant the Appellants a ten (10) day extension of time in which to serve the Appellants' *Response to Respondent's Motion to Dismiss Appeal* (the "*Motion to Dismiss*") in this appellate matter. The basis for this motion is (a) the recent Thanksgiving holidays, (b) appellant counsel's wife recently fell and suffered two fractured ribs, and (c) appellate counsel is h involved in other appellate and trial matters at this time and need the additional time in which to complete the Appellant's response to the *Motion to Dismiss*.

Based upon the current briefing schedule the Appellant's response is currently due to be served on or before **Monday, 8 December 2025** (*the 10<sup>th</sup> day falls on Saturday, 6 December 2025*). Consequently, in anticipation of a favorable reception and subsequent grant of this extension motion, the Appellants' response would then be due on or before **Thursday, 18 December 2025**.

Finally, the Appellants' respectfully requests this Court of Appeals to hold the briefing time in abeyance until such time as this joint motion may be considered and ruled upon.

Respectfully submitted:

*BUTLER SNOW LLP*

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Corporation; Bomasada Investment Group II, a Texas Limited  
Liability Company; Lauralis Management, Inc., a Texas  
Corporation; and 150 Bee Street, LLC, a South Carolina  
Limited Liability Company.*

Charleston, South Carolina

4 December 2025

**OTHER COUNSEL OF RECORD**

**WILL BE SHOWN ON**

**THE FOLLOWING PAGE**

## **OTHER COUNSEL OF RECORD**

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*Attorneys for the Respondent,  
Thomas H. Morgan*

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Defendants,

Of which 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, are the

Appellants.

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**PROOF OF SERVICE  
for  
MOTION FOR EXTENSION OF TIME  
IN WHICH TO RESPOND TO  
RESPONDENT'S MOTION TO DISMISS APPEAL**

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Limited Liability Company; Lauralis Management, Inc.,  
a Texas Corporation; and 150 Bee Street, LLC, a  
South Carolina Limited Liability Company*

I, Stephen P. Groves, Sr., Esquire, hereby certify that on **4 December 2025**, I served a copy of the **Motion for Extension of Time in Which to Respond to Motion to Dismiss Appeal** submitted by the Appellants, Stuart L. Fred, Bella Vista Partnership, a Texas General Partnership; Bomasada Group, Inc., a Texas Corporation; Bomasada Investment Group II, a Texas Limited Liability Company; Lauralis Management, Inc., a Texas Corporation; and 150 Bee Street, LLC, a South Carolina Limited Liability Company, on counsel for the Respondent, Thomas H. Morgan, via e-mail at the addresses noted:

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*Attorney for the Respondent, Thomas H. Morgan*

Signed: ***Stephen P. Groves, Sr.***  
Stephen P. Groves, Sr.

Charleston, South Carolina

4 December 2025  
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