

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

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Dec 15 2025

SC Court of Appeals

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

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.

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

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
BUTLER SNOW LLP
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
Telecopier: 843.277.3701
E-Mail: Stephen.Groves@butlersnow.com

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 an additional 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 four (not two) fractured ribs and a pneumothorax, and (c) appellate counsel is h involved in other appellate and trial matters at this time and needs 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 **Thursday, 18 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 **Monday, 29 December 2025** (*10th day falls on Sunday, 28 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

By: *Stephen P. Groves, Sr.*

Stephen P. Groves, Sr., Esquire
S.C. Bar No. 7854
25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
Telecopier: 843.277.3701
E-Mail: Stephen.Groves@butlersnow.com

*Attorneys for the Appellants,
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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

15 December 2025

OTHER COUNSEL OF RECORD

WILL BE SHOWN ON

THE FOLLOWING PAGE

OTHER COUNSEL OF RECORD

Robert A. Bernstein, Esquire
S.C. Bar No. 677
BERNSTEIN & BERNSTEIN, P.A.
Post Office Box 20519
Charleston, South Carolina 29413-0519
Telephone: 843.529.1111
E-Mail: rbernstein@bernsteinpa.com

W. Andrew Gowder, Jr., Esquire
S.C. Bar No. 7895
AUSTEN & GOWDER LLC
Post Office Box 20820
Charleston, South Carolina 29413
Telephone: 843.727.2229
E-Mail: andy@austengowder.com

*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.

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

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25 Calhoun Street, Suite 250
Charleston, South Carolina 29401
Telephone: 843.277.3704
Telecopier: 843.277.3701
E-Mail: Stephen.Groves@butlersnow.com

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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 **15 December 2025**, I served a copy of the **Motion for Second 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:

Robert A. Bernstein, Esquire
BERNSTEIN & BERNSTEIN, P.A.
E-Mail: rbernstein@bernsteinpa.com

W. Andrew Gowder, Jr., Esquire
AUSTEN & GOWDER LLC
E-Mail: andy@austengowder.com

Attorney for the Respondent, Thomas H. Morgan

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

Charleston, South Carolina

15 December 2025
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