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Jan 02 2026

SC Court of Appeals

**STATE OF SOUTH CAROLINA
IN THE
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.

**CONSENT MOTION FOR EXTENSION OF TIME (3rd)
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 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 holiday season, (b) appellant counsel's wife fell on 29 November 2025 and suffered four fractured ribs and a pneumothorax (and her healing has not progressed as would be expected), and (c) appellate counsel is 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*. Counsel for the Respondent, Thomas H Morgan ("Mr. Morgan"), have kindly consented to this additional extension of time.

Based upon the current briefing schedule the Appellant's response is currently due to be served on or before **Tuesday, 6 January 2026**. Consequently, in anticipation of a favorable reception and subsequent grant of this regrettably-requested third extension motion, the Appellants' response to the *Motion to Dismiss* would then be due on or before **Friday, 16 January 2026**.

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.*

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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

2 January 2026

OTHER COUNSEL OF RECORD

WILL BE SHOWN ON

THE FOLLOWING PAGE

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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.

**PROOF OF SERVICE
for
CONSENT MOTION FOR EXTENSION OF TIME (3rd)
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 **2 January 2026**, I served a copy of the **Motion for Extension of Time (3^d) 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

2 January 2026