

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Dale E. Van Slambrook
Circuit Court Judge

Appellate Case No. 2026-001588

Edward E. Schatz, Jr., individually and derivatively on behalf of Bajio, Inc.,
Respondent,

v.

Alvin P. Perkinson, III; Matthew Banker; Paul R. Vigano; and, as a nominal Defendant, Bajio Inc.,
Defendants,

of which Alvin P. Perkinson, III and Bajio Inc. are the Appellants.

MOTION FOR EXTENSION OF TIME

Pursuant to Rule 240, SCACR, Respondent Edward E. Schatz, through his undersigned counsel, respectfully requests a thirty-day extension of time to file *Respondent's Initial Brief* and *Respondent's Designation of Matter to Include in the Record on Appeal*. This is Respondent's first request for an extension of time as to these filings. This extension is requested due to unavoidable obligations that have arisen in other matters over the course of this month.

Respondent's Initial Brief and Designation of Matter to Include in the Record on Appeal are currently due on Wednesday, September 16, 2025. If this Motion is granted, the new deadline for these filings will be Friday, October 16, 2025. A thirty-day extension of

time will serve the interests of justice and aid this Court by allowing Respondent's appellate counsel adequate time to brief the issues on appeal. Respondent does not request this extension for the impermissible purpose of delay.

Respondent also respectfully requests that this Honorable Court hold all deadlines in abeyance until an Order has been issued on this Motion.

Respectfully Submitted,

s/ Wilson Daniel

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C. Wilson Daniel (SC Bar No. 104317)

Duffy & Young, LLC

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(843) 720-2044

Attorneys for Respondent Edward E. Schatz

August 25, 2026
Charleston, South Carolina

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SC Court of Appeals

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PROOF OF SERVICE

I certify that I have served Respondent's Motion for Extension of Time on Appellants
by email and by depositing a copy of it in the United States Mail, postage prepaid, on August
25, 2026 addressed to their attorneys of record:

Ryan D. Ellard, Esq.
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Attorneys for Appellants

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August 25, 2026
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ATTORNEYS AT LAW

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VIA E-MAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RE: Edward E. Schatz v. Alvin P. Perkinson, et al.
Appellate Case No.: 2026-001588
Circuit Court Case No.: 2026-CP-10-00881
Court of Common Pleas, Charleston County

Dear Ms. Kitchings:

Enclosed herewith please find Respondent's Motion for Extension of Time and Proof of Service in the above-referenced appeal. I have also enclosed a check in the amount of \$50.00 for payment of the associated filing fee.

Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully,



Liane M. Berns
Paralegal

Enclosures

cc: Ryan D. Ellard, Esq.
Molly M. McDermid, Esq.
M. Todd Carroll, Esq.