

**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

RECEIVED
Sep 30 2026
SC Court of Appeals

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 an additional 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 second request for an extension of time as to these filings. This extension is requested due to counsel being set for a week-long trial in Marion County in another matter the week of October 12, 2026.

Respondent's Initial Brief and Designation of Matter to Include in the Record on Appeal are currently due on Friday, October 16, 2026. Thirty days from the current deadline falls on Sunday, November 15, 2026. Therefore, if this Motion is granted, the new deadline

for these filings will be Monday, November 16, 2026. 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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September 30, 2026
Charleston, South Carolina