

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
Case Tracking No. 2014-001799

RECEIVED

APR 28 2015

APPEAL FROM RICHLAND COUNTY  
Civil Action No. 2011-CP-40-4111  
Alison Renee Lee, Circuit Court Judge

SC Court of Appeals  
75820

Coastal Pi, LLC d/b/a Primarily Pi and James Bigby.....Respondents.

vs.

Danville Business Advisors, LLC and Marion D. Turbeville.....Defendants,

Of Whom Marion D. Turbeville is.....Appellant.

---

**APPELLANT'S MOTION FOR AN EXTENSION OF TIME TO FILE REPLY  
BRIEF AND RECORD ON APPEAL**

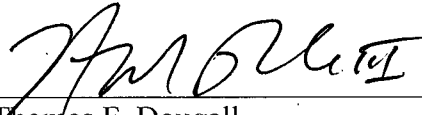
---

Appellant Marion D. Turbeville, by and through his undersigned counsel, hereby move pursuant to Rule 240, SCACR, for a thirty-day extension of time to file his Reply Brief and Record on Appeal. The Appellant's deadline is currently May 4, 2015.

Appellant respectfully moves this Court for an order extending the deadline to June 3, 2015, due to Appellant's counsel's schedule.

Counsel for the Respondents have graciously consented to this motion, as shown by the attached e-mail.

[Signature Page Follows]



Thomas F. Dougall  
Robert M. Peele, III  
DOUGALL & COLLINS  
1700 Woodcreek Farms Road, Suite 100  
Elgin, South Carolina 29405  
803.865.8858

*Attorneys for the Appellant*

April 28, 2015

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM RICHLAND COUNTY  
Court Of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge  
Alison Renee Lee, Circuit Court Judge

RECEIVED

APR 28 2015

SC Court of Appeals

---

CIVIL ACTION NO.: 2011-CP-40-4111  
APPELLATE CASE NO.: 2014-001799

---

Coastal Pi, LLC d/b/a Primarily Pi and James Bigby.....Respondents.

vs.

Danville Business Advisors, LLC and Marion D. Turbeville.....Defendants,

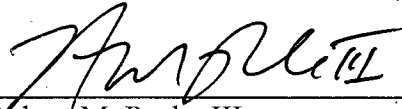
Of Whom Marion D. Turbeville is.....Appellant.

---

**PROOF OF SERVICE**

I, Robert M. Peele, III, an attorney of Dougall & Collins, attorneys for Appellant, Marion D. Turbeville do hereby certify that on the 28<sup>th</sup> Day of April 2015, I served the Appellant's **Motion for an Extension of Time to File his Reply Brief and Record on Appeal** upon opposing counsel by depositing copy of the same in the U.S. Mail, postage prepaid, and addressed as follows:

Benjamin C. Bruner, Esq.  
Bruner Powell Wall & Mullins, LLC  
Post Office Box 61110  
Columbia, SC 29260-1110  
*Attorney for Respondents*



---

Robert M. Peele, III

DOUGALL & COLLINS

1700 Woodcreek Farms Road, Suite 100

Elgin, South Carolina 29405

803.865.8858

April 28, 2015

Columbia, South Carolina

**DOUGALL & COLLINS**  
ATTORNEYS AND COUNSELORS AT LAW

**ADELAIDE DENNIS KLINE**  
OF COUNSEL

**THOMAS F. DOUGALL**  
ALSO ADMITTED IN TEXAS  
CERTIFIED MEDIATOR IN SC  
**WILLIAM A. COLLINS, JR.**  
**ROBERT M. PEELE, III**

**RECEIVED**

APR 28 2015

**SC Court of Appeals**

April 28, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: *Coastal PI, LLC d/b/a Primarily PI and James Bigby v. C.G.I. Development, Inc., Danville Business Advisors, LLC, Marion D. Turbeville, and FRS, INC.;*  
Case Number: 2011-CP-40-4111  
Appellate Case Number: 2014-001799

Dear Madame Clerk:

Please find enclosed the original and one copy of Respondents' Motion for an Extension of Time in the above-referenced case, together with a Proof of Service of the same and a check in the amount of \$25 for the filing fee. Please file the original and return a clocked clock to our courier. If you have any questions please do not hesitate to contact me.

With kind regards,

Sincerely,

**DOUGALL & COLLINS**



Robert M. Peele, III

RMP/mdh

Enclosures

cc: Benjamin C. Bruner, Esq.  
Robert G. Rikard, Esq.  
Marion D. Turbeville

**Rob Peele**

---

**From:** "Ben Bruner" <BBruner@brunerpowell.com>  
**To:** <rpeelee@dougallfirm.com>  
**Cc:** <cusry@rplegalgroup.com>  
**Sent:** Monday, April 27, 2015 6:16 PM  
**Subject:** RE: Coastal Pi v. Danville  
Absolutely.

Benjamin C. Bruner  
**BRUNERPOWELL**

BRUNER, POWELL, WALL & MULLINS, LLC  
P.O. Box 61110  
1735 St. Julian Place, Suite 200 (29204)  
Columbia, SC 29260-1110  
(p) 803.252.7693  
(f) 803.254.5719  
[www.brunerpowell.com](http://www.brunerpowell.com)

**CONFIDENTIAL COMMUNICATION:** The information contained in this message may contain legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or duplication of this transmission is strictly prohibited. If you have received this communication in error, please notify us by telephone or email immediately and return the original message to us or destroy all printed and electronic copies. Nothing in this transmission is intended to be an electronic signature nor to constitute an agreement of any kind under applicable law unless otherwise expressly indicated. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

**CIRCULAR 230 DISCLOSURE:** To comply with Treasury Department regulations, we inform you that, unless otherwise expressly indicated, any tax advice contained in this communication (including any attachments) is not intended to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the Internal Revenue Code or any other applicable tax law, or (ii) promoting, marketing or recommending to another party any transaction, arrangement, or other matter.

---

**From:** Rob Peele [mailto:rpeelee@dougallfirm.com]  
**Sent:** Monday, April 27, 2015 6:15 PM  
**To:** Ben Bruner  
**Cc:** cusry@rplegalgroup.com  
**Subject:** Coastal Pi v. Danville

Ben,

Would you consent to allow me a 30 day extension to reply to your brief?

Robert M. Peele, III  
Dougall & Collins  
1700 Woodcreek Farms Road  
Elgin, SC 29045  
[rpeelee@dougallfirm.com](mailto:rpeelee@dougallfirm.com)  
803.865.8858 (Office)  
803.609.7072 (Cell)  
\*\*\*\*\*

**"ATTORNEY-CLIENT PRIVILEGED; DO NOT FORWARD WITHOUT PERMISSION."**  
**The information contained in this transmission is privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to this email and delete all copies of this message and all attachments.**