

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM MARION COUNTY
Court Of Common Pleas

MAY 31 2016

SC Court of Appeals

The Honorable W. Haigh Porter, Special Referee

Case No: 2015-CP-33-280
Appellate Case No.: 2016-000956

PARTNERS 95, LLC and HSGCHG Investments, LLC Respondents,

v.

Riverdale Funding, LLC and Woodbridge
Mortgage Investment Fund 3, LLC Appellants.

MOTION FOR EXTENSION OF TIME TO FILE
APPELLANTS' INITIAL BRIEF AND
DESIGNATION OF MATTER

As Appellants' Notice of Appeal was filed on May 6, 2016, and all transcripts were received prior to that filing, Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal currently are due to be filed on June 6, 2016.

Appellants respectfully request a thirty (30) day extension of time in which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal. This brief extension would establish **July 6, 2016** as the new deadline. Appellants request this additional time due to scheduling conflicts and to permit counsel adequate time to assess the issues presented in this appeal.

The undersigned counsel for Appellants has consulted with counsel for

Respondents, and Respondents do not object to this extension. (See Ex. A).

GALLIVAN, WHITE & BOYD, P.A.

By: 

Amy L.B. Hill, SC Bar # 68541

Laura W. Jordan, SC Bar # 100374

PO Box 7368

Columbia, SC 29202

ahill@gwblawfirm.com

ljordan@gwblawfirm.com

(803) 779-1833 Ofc

(803) 779-1767 Fax

Attorneys for Appellants

Columbia, South Carolina

May 31, 2016

Lindsey Jones

From: Taylor Stanley <TaylorStanley@callisontighe.com>
Sent: Tuesday, May 31, 2016 8:39 AM
To: Laura Jordan
Cc: Amy Hill; Lindsey Jones
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Laura,

Hope you had a great Memorial Day Weekend. I consent to the extension below.

Taylor

CALLISON  **TIGHE**

W. Taylor Stanley
Callison Tighe & Robinson, LLC
1812 Lincoln Street
P.O. Box 1390
Columbia, SC 29202

P 803.404.6900
F 803.404.6902
E TaylorStanley@callisontighe.com

[Download vCard](#)

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.

IRS CIRCULAR 230 NOTICE: Any federal tax advice contained in this communication (or in any attachment) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending any transaction or matter addressed in this communication.



From: Laura Jordan [<mailto:ljordan@gwblawfirm.com>]
Sent: Friday, May 27, 2016 2:05 PM
To: Taylor Stanley <TaylorStanley@callisontighe.com>
Cc: Amy Hill <ahill@gwblawfirm.com>; Lindsey Jones <ljones@gwblawfirm.com>
Subject: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Taylor,

Hope all is well with you. By our calculations, the deadline for submission of our Appellants' Brief and DOM is June 6. Would you consent to a 30-day extension of time, which would move the deadline to July 6? Of course, we would be glad to extend the favor to you should you need it when compiling your Appellee Brief and DOM.

Thanks so much,

Laura



Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW

Laura Jordan
Of Counsel
ljordan@GWBlawfirm.com

Gallivan, White & Boyd P.A.
Office 1201 Main Street | Suite 1200 | Columbia SC 29201
803 724 1710 Direct | 803 779 1833 Main | 803 779
1767 Fax
Mailing Post Office Box 7368 | Columbia SC 29202
[vCard](#) | [BioURL](#) | [Website](#)

This message is from the law firm Gallivan, White & Boyd, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this email. Thank you.

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
MAY 31 2016
SC Court of Appeals

APPEAL FROM MARION COUNTY
Court Of Common Pleas

The Honorable W. Haigh Porter, Special Referee

Case No: 2015-CP-33-280
Appellate Case No.: 2016-000956

PARTNERS 95, LLC and HSGCHG Investments, LLC Respondents,

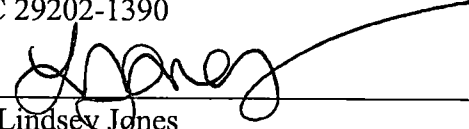
v.

Riverdale Funding, LLC and Woodbridge
Mortgage Investment Fund 3, LLC Appellants.

PROOF OF SERVICE

I, Lindsey Jones, the undersigned employee of Gallivan, White & Boyd, P.A., attorneys for the Appellants, do hereby certify that I have served a copy of the foregoing **Motion for Extension of Time**, in connection with the above-referenced case by mailing a copy of the same on May 31, 2016; by United States Mail, postage prepaid, to the following address:

William Taylor Stanley, SC Bar # 101377
Callison Tighe & Robinson, LLC
1812 Lincoln Street
PO Box 1390
Columbia, SC 29202-1390



Lindsey Jones

Columbia, South Carolina
May 31, 2016

AMY L.B. HILL
Direct Dial: 803.724.1716
ahill@gwblawfirm.com



Gallivan, White & Boyd, P.A.
—ATTORNEYS AT LAW—

REPLY TO: Columbia Office
1201 Main Street, Suite 1200 (29201)
Post Office Box 7368
Columbia, SC 29202-7368
803.779.1833 - TEL
803.779.1767 - FAX
www.gwblawfirm.com

May 31, 2016

SENT BY HAND DELIVERY

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

RECEIVED
MAY 31 2016
SC Court of Appeals

Re: Partners 95, LLC and HSGCHG Investments, LLC vs. Riverdale Funding, LLC and
Woodbridge Mortgage Investment Fund 3, LLC
Appellate Case No.: 2016-000956

Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of Defendants' Motion for Extension of Time in which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Also enclosed is our firm's check in the amount of \$25.00 for the filing fee. Please return a filed-stamped copy to my office via our courier.

By copy of this letter, I am serving the same on opposing counsel and providing a courtesy copy to Special Referee Haigh Porter.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Laura W. Jordan

LWJ:lj

Enclosures

cc: W. Taylor Stanley, Esquire (by U.S. Mail)