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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUL 14 2016

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Civil Action No. 2014-CP-26-08367
(formerly 2013-CP-26-02816)

Pursuant to Order of the Court Consolidated with

Civil Action No. 2014-CP-26-3362

Gabriel Barnhill and GSB
Enterprises, LLC,

Respondents,

v.

J. Floyd Swilley, J. Floyd Swilley
Investment Advisors, Laurel K.
Swilley, SMG Partners, LLC, SMS
Services, LP, William C. Piner, WCP
Limited, LLC, 809 Holdings, LP, QC
Financing, LLC, Heath Causey, and
Sage Financial Group, LLC,

of whom J. Floyd Swilley and
Laurel K. Swilley are the

Appellants.

Gabriel Barnhill and GSB
Enterprises, LLC,

Plaintiffs,

v.

J. Floyd Swilley, J. Floyd Swilley,
SMG Partners, LLC, SMS Services,
LP, William C. Piner, WCP Limited,
LLC, Alicia Piner, 809 Holdings, LP,
Heath Causey, Sage Financial

Group, LLC, Sage Advisory Group,
L.P., Sage Private Equity Group,
Secured Asset Factoring Exchange,
Inc., SAFE, Inc., Digics, LLC, 9-1-1,
Plumbing, LLC, and Sage Funding,
L.P., Christopher Pitcock,

Defendants.

MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF BY
APPELLANTS J. FLOYD SWILLEY AND LAUREL K. SWILLEY

Counsel for both Appellants J. Floyd Swilley and Laurel K. Swilley hereby respectfully move before the Court, pursuant to Rule 240(a) SCACR, for a sixty (60) day extension of time to file Initial Brief and Designation of Matter to be included in the Record on Appeal which is currently due July 15, 2016. The Appellants are not ordering transcripts of record.

This Motion and the extension request are based on the work schedules, caseload and other commitments of counsel for the Appellants. Counsel respectfully contends that good cause exists for an extension of time to file the Initial Brief and Designations of Matter.

Wherefore, the Appellants contend that this appeal and the interest of justice will be served by granting the Appellants an extension of time, the parties therefore respectfully pray the Court for an order granting the Appellants an extension of sixty (60) days to file their Initial Briefs and Designations of Matter to be included in the Record on Appeal.

Accordingly, the Appellants respectfully request the Court to enter an Order enlarging the time up to and including, September 15, 2016 for the Appellants to submit their Initial Briefs and Designations of Matter to be included in the Record on Appeal.

July 13, 2016

I SO MOVE:



F. Miles Adler
ADLER LAW FIRM, LLC
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T: 843.314.3204
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Attorney for Appellants

Counsel of Record:

Nate Fata, P.A.
P.O. Box 16620
Surfside Beach, SC 29587
T: 843.238.2676
Attorney for Respondents

Pro Se Defendants:

Heath Causey
1035 Pinwheel Loop
Myrtle Beach, SC 29577

Christopher Pitcock
24242 Branchwood Court
Lutz, FL 33559

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Secured Asset Factoring Exchange,
Inc., SAFE, Inc., Digics, LLC, 9-1-1,
Plumbing, LLC, and Sage Funding,
L.P., Christopher Pitcock,

Defendants.

PROOF OF SERVICE

I certify that I have served the motion for Extension of Time to File Initial Brief and Designation of Matter by Appellants J. Floyd Swilley and Laurel K. Swilley by depositing a copy of it in the United States mail, postage prepaid, on July 13, 2016 addressed to the following:

Counsel of Record:

Nate Fata, P.A.
P.O. Box 16620
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Attorney for Respondents

Pro Se Defendants:

Heath Causey
1035 Pinwheel Loop
Myrtle Beach, SC 29577

Christopher Pitcock
24242 Branchwood Court
Lutz, FL 33559



F. Miles Adler

F. MILES ADLER

ATTORNEY AT LAW

July 13, 2016

VIA UPS OVERNIGHT DELIVERY

The Honorable Jenny Abbot Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Gabriel Barnhill and GSB Enterprises, LLC v J. Floyd Swilley at al.
C/A No.: 2014-CP-26-08367
Appellate Case No.: 2016 - _____

Dear Ms. Kitchings:

Enclosed for filing the original and seven (7) copies of the Appellants' Motion for Extension of Time to File Initial Brief and Designation of Matter in the above referenced matter. Also enclosed is the filing fee in the amount of \$25.00.

Please return a filed copy to our office in the enclosed self-addressed stamped envelope.

Thank you for your kind assistance in this matter.

Sincerely,



F. Miles Adler

Enclosures

cc w/enc.: Nate Fata
Heath Causey, Pro Se
Christopher Pitcock, Pro Se

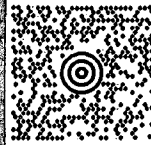
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SC 291 9-01



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