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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM MARION COUNTY
Court of Common Pleas

SEP 06 2016

The Honorable W. Haigh Porter, Special Referee

SC Court of Appeals

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.

**RESPONDENTS' MOTION REQUESTING
EXTENSION TO FILE INITIAL BRIEF
AND DESIGNATION OF MATTER**

This Motion of the Respondents' seek an Order of this Court, pursuant to Rule 240, SCACR, extending the time to file its Initial Brief and Designation of Matter in the above-captioned appeal. Respondents' Initial Brief and Designation of Matter is currently due to be filed on September 6, 2016. The ground for this Motion is due to scheduling conflicts and to permit counsel adequate time to assess the issues presented in this appeal. This Motion is not made for purposes of undue delay or any other improper purpose.

THEREFORE, the Respondents request an Order extending the time to file and serve the Initial Brief of Respondents and Designation of Matter for fourteen (14) days, making the new deadline September 19, 2016. The undersigned counsel for Respondents has consulted with counsel for Appellants, and Appellants have consented to this extension.



W. Taylor Stanley
CALLISON TIGHE & ROBINSON, LLC
Post Office Box 1390
Columbia, South Carolina 29202-1390
Telephone: 803-404-6900
Facsimile: 803-404-6902
Attorneys for Respondents

September 2, 2016
Columbia, South Carolina

THE STATE OF SOUTH CAROLINA
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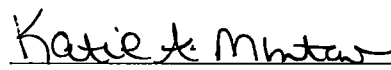
Riverdale Funding, LLC and Woodbridge Mortgage Investment Fund 3, LLC Appellants.

PROOF OF SERVICE

I certify that I have served a copy of the following as indicated hereinbelow, by mailing a copy of same on the date below by First Class United States Mail, postage prepaid, addressed to the following:

DOCUMENT SERVED: Respondents' Motion Requesting Extension to File Initial Brief and Designation of Matter

PARTIES SERVED: Amy L.B. Hill, Esquire
Laura W. Jordan, Esquire
Gallivan White & Boyd, P.A.
P.O. Box 7368
Columbia, SC 29202-7368
Attorneys for Appellants


Katie A. Minton

September 2, 2016
Columbia, South Carolina

W. TAYLOR STANLEY

803.404.6900

TaylorStanley@callisontighe.com

Admitted in SC and NC

CALLISON  TIGHE

September 2, 2016

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
1220 Senate Street
Columbia, SC 29201

**Re: Partners 95, LLC and HSGCHG Investments, LLC vs.
Riverdale Funding, LLC and Woodbridge Mortgage Investment
Fund 3, LLC
Appellate Case No. 2016-000956
Our Case No. 6151.003**

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Respondents' Motion Requesting Extension to File Initial Brief and Designation of Matter and Proof of Service, in connection with the above-referenced matter. Also enclosed please find my firm's check in the amount of \$25.00 as the required filing fee. Please return one (1) clocked-in copy to me via my courier.

Thank you for your assistance in this matter.

With warmest regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC



W. Taylor Stanley

WTS/kam

Enclosures

cc: (w/ encl.) Amy L.B. Hill, Esquire
Laura W. Jordan, Esquire

W. TAYLOR STANLEY
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CALLISON  TIGHE

September 6, 2016

RECEIVED

SEP 06 2016

SC Court of Appeals

VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
1220 Senate Street
Columbia, SC 29201

**Re: Partners 95, LLC and HSGCHG Investments, LLC vs.
Riverdale Funding, LLC and Woodbridge Mortgage Investment
Fund 3, LLC
Appellate Case No. 2016-000956
Our Case No. 6151.003**

Dear Ms. Kitchings:

On Friday, September 2, 2016, at approximately 12:15 p.m., my office attempted to hand-deliver Respondents' Motion Requesting Extension to File Initial Brief and Designation of Matter and Proof of Service to your office for filing. All doors to the Court of Appeals building were locked and no one was visible from the outside. It appears that your office closed at approximately noon when Richland County also closed early for the day due to inclement weather.

Therefore, please accept the enclosures for filing with your office today.

If you should have any questions, please do not hesitate to contact me.

With warmest regards, I am

Sincerely yours,

CALLISON TIGHE & ROBINSON, LLC



W. Taylor Stanley

WTS/kam
Enclosures
cc: (w/ encl.) Amy L.B. Hill, Esquire
Laura W. Jordan, Esquire