

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM MARION COUNTY
Court Of Common Pleas

The Honorable W. Haigh Porter, Special Referee

RECEIVED
SEP 20 2016
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.

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

Appellants respectfully request a ten (10) day extension of time in which to file and serve their Initial Reply Brief and any additional Designation of Matter to be Included in the Record on Appeal. Appellants are informed that Respondents filed and served their Initial Brief and Designation of Matter by US Mail on September 19, 2016, which establishes September 29, 2016 as the current deadline for Appellants' reply filings.

A ten-day extension of time would establish **October 10, 2016** as the new deadline for Appellants to file and serve their Initial Reply Brief and any additional



Designation of Matter.¹ Appellants request this additional time due to scheduling conflicts and to permit counsel adequate time to assess the arguments presented in Respondents' Brief.

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
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(803) 779-1833 Ofc
(803) 779-1767 Fax

Attorneys for Appellants

Columbia, South Carolina
September 20, 2016

¹ Ten days from September 29 is October 9, which is a Sunday.

Kelly Canaday

From: Taylor Stanley <TaylorStanley@callisontighe.com>
Sent: Tuesday, September 20, 2016 11:04 AM
To: Katie Minton; Laura Jordan
Cc: Lindsey Jones; Amy Hill; Kelly Canaday
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Laura,

Yes, you have my consent to a ten day extension, making the brief due on October 9, 2016.

Thanks,

Taylor

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SEP 20 2016

SC Court of Appeals

From: Katie Minton
Sent: Tuesday, September 20, 2016 11:02 AM
To: Laura Jordan <ljordan@gwblawfirm.com>; Taylor Stanley <TaylorStanley@callisontighe.com>
Cc: Lindsey Jones <ljones@gwblawfirm.com>; Amy Hill <ahill@gwblawfirm.com>; Kelly Canaday <kcanaday@gwblawfirm.com>
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Good Morning,

Please see attached as requested.

CALLISON  TIGHE

Katie A. Minton, Paralegal
Callison Tighe & Robinson, LLC
1812 Lincoln Street, Second Floor
P.O. Box 1390 (29202-1390)
Columbia, SC 29201

P: 803.404.6900 **F:** 803.404.6902
Email: KatieMinton@callisontighe.com



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From: Laura Jordan [<mailto:ljordan@gwblawfirm.com>]
Sent: Tuesday, September 20, 2016 10:25 AM
To: Taylor Stanley <TaylorStanley@callisontighe.com>
Cc: Lindsey Jones <ljones@gwblawfirm.com>; Katie Minton <KatieMinton@callisontighe.com>; Amy Hill <ahill@gwblawfirm.com>; Kelly Canaday <kcanaday@gwblawfirm.com>
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Taylor,

Would you mind emailing us a copy of the brief and DOM you filed yesterday? I don't see it on C-track yet, and our service copy may not arrive for a while given the glacial pace of US Mail. Also, may we have your consent to a 10-day extension for filing our Reply Brief and any additional DOM?

Thanks,
Laura



Laura Jordan
Of Counsel
ljordan@GWBlawfirm.com

Gallowan, 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

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vCard | BioURL | Website

This message is from the law firm Gallowan, 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.

From: Taylor Stanley [<mailto:TaylorStanley@callisontighe.com>]
Sent: Friday, September 2, 2016 2:40 PM
To: Amy Hill; Laura Jordan
Cc: Lindsey Jones; Katie Minton
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

Amy,

We had some folks run over there today and it was already closed. The motion will be filed on Tuesday.

Thanks,

Taylor

From: Amy Hill [<mailto:ahill@gwblawfirm.com>]
Sent: Friday, September 02, 2016 11:36 AM
To: Taylor Stanley <TaylorStanley@callisontighe.com>; Laura Jordan <ljordan@gwblawfirm.com>
Cc: Lindsey Jones <ljones@gwblawfirm.com>; Katie Minton <KatieMinton@callisontighe.com>
Subject: RE: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

You sure can.

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PARTNERS 95, LLC and HSGCHG Investments, LLC Respondents,

v.

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PROOF OF SERVICE

I, Kelly Canaday, 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 September 20, 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



Kelly C. Canaday

Columbia, South Carolina
September 20, 2016

LAURA W. JORDAN
Direct Dial: 803.724.1710
ljordan@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

September 20, 2016

SENT BY HAND DELIVERY

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

RECEIVED
SEP 20 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 Appellants' Motion for Extension of Time in which to file and serve their Initial Reply 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.

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Laura W. Jordan

LWJ:ljj
Enclosures

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