

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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OCT 10 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.

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. The current deadline for Appellants' reply filings is Monday, October 10, 2016. Appellants request this additional time due to the unusual circumstances preceding the approach of Hurricane Matthew, including evacuations and school closures, which have made it difficult to meet the current deadline.

The undersigned counsel for Appellants has consulted with counsel for Respondents, and Respondents do not object to this extension. (See Ex. A).

A ten-day extension of time would establish **October 20, 2016** as the new deadline for Appellants to file and serve their Initial Reply Brief and any additional

✓

Designation of Matter.

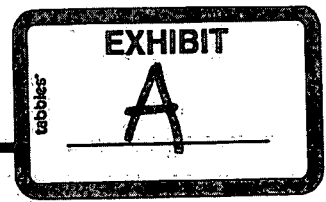
**GALLIVAN, WHITE & BOYD, P.A.**

By: 

Amy L.B. Hill, SC Bar # 68541  
Laura W. Jordan, SC Bar # 100374  
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*Attorneys for Appellants*

Columbia, South Carolina  
October 6, 2016



**Laura Jordan**

**From:** Taylor Stanley <TaylorStanley@callisontighe.com>  
**Sent:** Wednesday, October 5, 2016 6:01 PM  
**To:** Laura Jordan  
**Cc:** Katie Minton; Lindsey Jones; Amy Hill; Kelly Canaday  
**Subject:** Re: Partners 95 LLC, et al v. Riverdale Funding LLC, et al: Appellate Case No. 2016-956

No objection.

W. Taylor Stanley  
Callison Tighe & Robinson, LLC  
Sent from my iPhone

On Oct 5, 2016, at 9:39 AM, Laura Jordan <ljordan@gwblawfirm.com> wrote:

Taylor,

It is our understanding that the Court of Appeals is closed for the next 3 days. Given the current uncertainty regarding the weather, may we have your consent for an additional 10-day extension of time to file and serve our Reply Brief and any additional DOM? Currently, the deadline is Monday, October 10. A 10-day extension would establish October 20 as the new deadline.

Thanks in advance,  
Laura

**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  
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vCard | BioURL | Website

<image009.jpg>

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.

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**From:** Taylor Stanley [mailto: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.

THE STATE OF SOUTH CAROLINA  
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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 October 6, 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

Columbia, South Carolina  
October 6, 2016

  
Kelly C. Canaday

LAURA W. JORDAN  
Direct Dial: 803.724.1710  
ljordan@gwblawfirm.com



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

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October 10, 2016

**VIA HAND-DELIVERY**

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

**RECEIVED**

**OCT 10 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:

Given last week's extended closure of the Court and the unusual circumstances surrounding the impact of Hurricane Matthew, we have enclosed additional copies of our October 6, 2016 Motion for Extension of Time that we mailed to the Court for filing last week. After talking with our case manager this morning, we understand that there is some uncertainty about the Court's mail service and whether our motion will be received and processed today. As the current deadline for filing our Reply Brief is today, we are sending duplicate copies out of an abundance of caution and to ensure timely receipt by the Court.

For your convenience, we have enclosed a duplicate 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:kcc  
Enclosures

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