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OCT 11 2016
SC Court of Appeals

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

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.

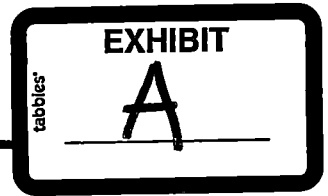
By:



Amy L.B. Hill, SC Bar # 68541
Laura W. Jordan, SC Bar # 100374
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Columbia, SC 29202
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(803) 779-1833 Ofc
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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
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<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.

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.

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PARTNERS 95, LLC and HSGCHG Investments, LLC Respondents,

v.


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Mortgage Investment Fund 3, LLC Appellants.

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—

REPLY TO: Columbia Office
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Post Office Box 7368
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October 6, 2016

**SENT VIA U.S. MAIL
(DUE TO COURT CLOSURE)**

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

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OCT 11 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:lj
Enclosures

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

✓

NEOPOST

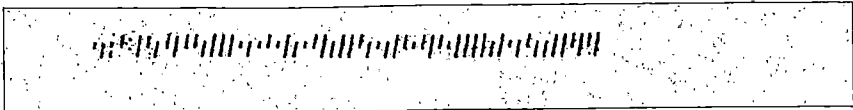
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10/06/2016

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Gallivan, White & Boyd, P.A.
ATTORNEYS AT LAW
1201 Main Street, Suite 1200
Post Office Box 7368 (29202)
Columbia, South Carolina 29201

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

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