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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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NOV 15 2016

**SC Court of Appeals**

APPEAL FROM HORRY COUNTY  
Court of Common Pleas  
R. Lawton McIntosh, Circuit Court Judge 15<sup>th</sup> Judicial Circuit

**Civil Action No. 2014-CP-26-08367  
2014-CP-26-03362 (formerly 2013-CP-02816)**

Appellate Case No. 2016-001328

Gabriel Barnhill & 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, J  
Floyd Swilley, SMG Partners LLC, Alicia  
Piner, Heath Causey, Sage Advisory  
Group LP, Sage Private Equity Group  
LLC, Secured Asset Factoring Exchange,  
Inc, SAFE, Inc, Digics, LLC, 9-1-1  
Plumbing, LLC, and Sage Funding, LP  
and Christopher Pitcock,

Defendants

of whom J Floyd Swilley, Laurel K Swilley  
and Heath Wendell Causey, are the Appellants.

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

Appellants Laurel Swilley and Floyd Swilley by counsel hereby respectfully  
moves before the Court, pursuant to Rule 240(a) SCACR, for a Thirty (30) day

extension of time to file their Response to Initial Briefs of the Respondent which was received Friday November 4, 2016 currently due November 13, 2016. The Appellants and their counsel have previously scheduled matters and need additional time to prepare their Reply. Further Appellants' adopt and concur with the Appellants' Heath Causey Motion for Extension of Additional Time.

This Appellant also contends that this appeal and granting this extension of time of thirty (30) days will be in the interest of justice. In addition this Appellant also respectfully prays that the Court grant an order of Extension of thirty (30) days to file the Appellants' Reply Brief.

Accordingly, the Appellants respectfully requests the Court to enter an Order extending the time up to and including, December 13, 2016 for this Appellant to submit his Response Brief.

I SO MOVE:



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F. Miles Adler  
ADLER LAW FIRM, LLC  
P.O. Box 4743  
Pawleys Island, SC 29585  
*Attorney for Appellants Swilleys*

Counsel of Record:

Nate Fata, PA  
P.O. Box 16620  
Surfside Beach, SC 29587  
*Attorney for Respondents*

Heath W Causey, Pro Se Appellant  
1705 N Oak Street Suite 2  
Myrtle Beach, SC 29577  
Pro Se Appellant

Christopher Pitcock  
24242 Branchwood Court  
Lutz, FL 33559  
*Pro Se Defendant*

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of whom J Floyd Swilley, Laurel K Swilley  
and Heath Wendell Causey, are the

Appellants.

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PROOF OF SERVICE

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I certify that I have served the motion for Extension of Time to File Reply Brief by  
Appellants J. Floyd Swilley and Laurel K. Swilley by depositing a copy of it in the United

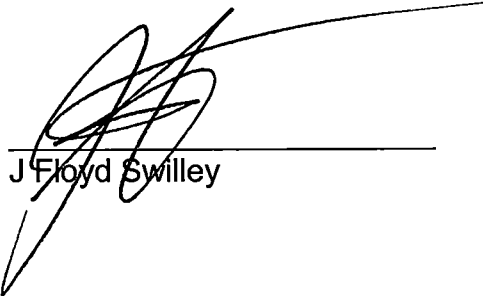
States mail, priority delivery, postage prepaid, on November 11, 2016 addressed to the following:

Counsel of Record:

Nate Fata, PA  
P.O. Box 16620  
Surfside Beach, SC 29587  
*Attorney for Respondents*

Heath Causey  
1705 N Oak Street Suite 2  
Myrtle Beach, SC 29577  
*Pro Se*

Christopher Pitcock  
24242 Branchwood Court  
Lutz, FL 33559  
*Pro Se Defendants*



J. Floyd Swilley

F. MILES ADLER

ATTORNEY AT LAW

November 11, 2016

**VIA USPS PRIORITY MAIL**

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

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Re: Gabriel Barnhill and GSB Enterprises, LLC v J. Floyd Swilley et al.  
Appellate Case No.: 2016 -001328

Dear Ms. Kitchings,

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

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

Thank you for your kind assistance in this matter

Sincerely,



F. Miles Adler

CC: Nate Fata  
Heath Causey, Pro Se  
Christopher Pitcock, Pro Se

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

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