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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
R. Lawton McIntosh, Circuit Court Judge 15th 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 APPELLANT HEATH W. CAUSEY

Appellant Heath W. Causey herby respectfully moves before the Court, pursuant
to Rule 240(a) SCACR, for a Thirty (30) day extension of time to file his Response to

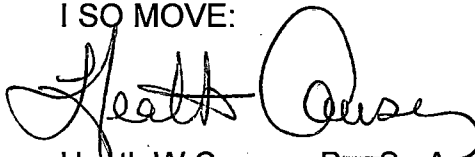
Initial Briefs of the Respondent which was received Thursday, November 3, 2016 currently due November 13, 2016.

This Motion and the extension request are based on the fact the Respondents raised new issues that must be addressed and I, as an unrepresented party, request additional time to research those issues as well as this Appellants right to join his arguments with that of the other Appellants, the others Appellants known conflicts with- in their work schedules, their counsel's caseload and other commitments of the Appellants that I may not be aware of and counsel for the Appellants.

This Appellant Heath W. Causey respectfully contends that good cause exists for an extension of time to file his Initial Brief and Designations of Matter. 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 Appellant's Reply Brief.

Accordingly, the Appellant 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:



Heath W Causey, Pro Se Appellant
1705 N Oak Street Suite 2
Myrtle Beach, SC 29577
t. 843-424-9258
heath.causey@mac.com
Pro Se Appellant

Copies to:

Counsel of Record:

Nate Fata, PA

P.O. Box 16620

Surfside Beach, SC 29587

Attorney for Respondents

F. Miles Adler

ADLER LAW FIRM, LLC

P.O. Box 4743

Pawleys Island, SC 29585

Attorney for Appellants Swilleys

Christopher Pitcock

24242 Branchwood Court

Lutz, FL 33559

Pro Se Defendant

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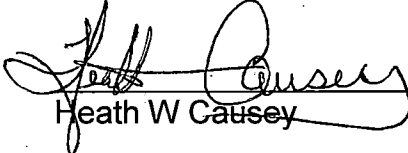
I certify that I have served the motion for Extension of Time to File Reply Brief by Appellant Heath W Causey by depositing a copy of it in the United States mail, postage prepaid, on November 10, 2016 addressed to the following:

Counsel of Record:

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

F. Miles Adler
ADLER LAW FIRM, LLC
P.O. Box 4743
Pawley's Island, SC 29585
Attorney for Appellants "Swilleys"

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


Heath W Causey

Heath W. Causey
1705 N Oak Street Suite 2
Myrtle Beach, SC 29577

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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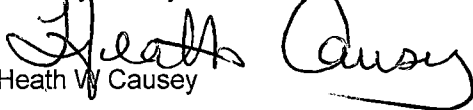
Re: Gabriel Barnhill and GSB Enterprises, LLC v J. Floyd Swilley at al.
Case No.: 2014-CP-26-08367 Appellate Case No.: 2016 -001328

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


Heath W. Causey

CC: Nate Fata
F. Miles Adler, Esq
Christopher Pitcock, Pro Se

J

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