

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Case No. 2014-CP-26-8367 (Formerly 2013-CP-26-2816)

Appellate Case No. 2016-001328

**RECEIVED**  
MAY 04 2017  
SC Court of Appeals

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 A. Piner, Heath Causey, Sage Advisory Group, L.P., Sage Private Equity Group, Secured Asset Factoring Exchange, Inc., SAFE, Inc., Digics, LLC, 9-1-1, Plumbing, LLC, and Sage Funding, L.P., Christopher Pitcock, Defendants,

Of Whom J. Floyd Swilley and Laurel K. Swilley and Heath Wendell Causey are the ..... Appellants

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NOTICE OF MOTION AND MOTION FOR EXTENSION  
OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER

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Appellants, J. Floyd Swilley and Laurel K Swilley, by and through counsel, moves before this Honorable Court for an extension of <sup>15</sup>~~ten~~ days <sup>15</sup>~~(10)~~ days to file the Record on Appeal. Due to counsel's case load and issues obtaining documents to complete the record, counsel for the Appellants does not believe he will have sufficient time to complete the Record on Appeal by *its* current due date of May 4, 2016. Therefore, Respondents are requesting a fifteen (15) day extension until May 19, 2016. Appellants appreciate the Court's consideration.

*(Signature)*

✓



F. Miles Adler

ADLER LAW FIRM, LLC

SC Bar No.: 70238

P.O. Box 4743

Pawleys Island, SC 29585

*Attorney for Laurel K. Swilley and J. Floyd Swilley*

May 3, 2017  
Pawleys Island, SC

THE STATE OF SOUTH  
CAROLINA

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\_\_\_\_\_  
PROOF OF SERVICE  
\_\_\_\_\_

I certify that I have served the Motion For Extension of Time To File Record on Appeal on Nate Fata, Esquire and Heath Wendell Causey, Pro Se by depositing a copy of same in the United States Mail, postage prepaid, on May 3, 2017, addressed to Nate Fata Esquire, Nate Fata, P.A., Post Office Box 1620, Surfside Beach, SC 29587 and Heath Wendell Causey, 1705 N. Oak Street, Suite 2, Myrtle Beach, SC 29577.



F. Miles Adler

ADLER LAW FIRM, LLC

SC Bar No.: 70238

P.O. Box 4743

Pawleys Island, SC 29585

*Attorney for Laurel K. Swilley and J. Floyd Swilley*

May 3, 2017

Pawleys Island, SC

F. MILES ADLER

ATTORNEY

May 3, 2017

**VIA PRIVATE COURIER/UPS**

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

**RECEIVED**

MAY 04 2017

**SC Court of Appeals**

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 six (6) copies of the Appellants' Notice of motion and motion for Extension of time to file Record on Appeal and Proof of service of same.

Please also find enclosed a check for \$25.00 which constitutes the filing fee.

Please file same and return a clocked 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

ADLER LAW FIRM, LLC  
P.O. Box 4743  
Pawleys Island South Carolina 29585  
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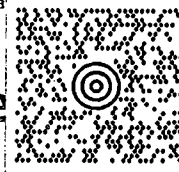
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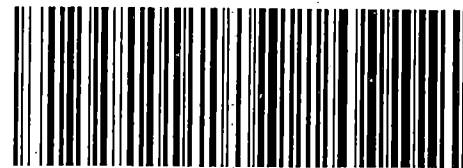
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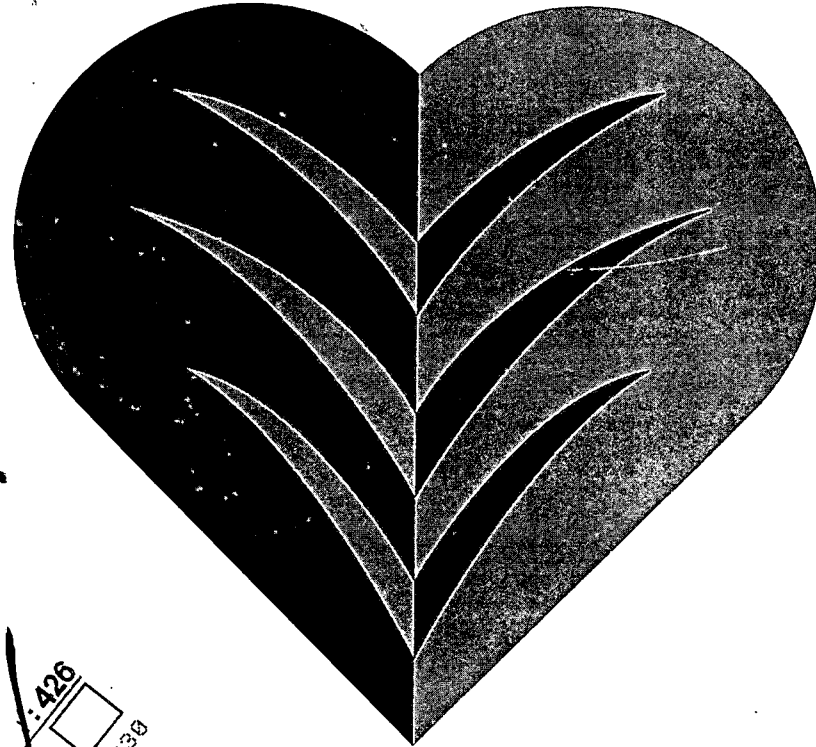
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