

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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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

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NOV 06 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

NOTICE OF MOTION AND MOTION FOR SEVEN DAY EXTENSION
OF TIME TO FILE FINAL BRIEFS

Respondents Gabriel Barnhill & GSB Enterprises, LLC move this Honorable Court for a seven (7) day extension to file their Final Brief in J. Floyd Swilley and Laurel K. Swilley and Respondents' Gabriel Barnhill & GSB Enterprises, LLC's request a seven (7) day extension to file their Final Brief in Heath Wendell Causey. The Respondents'



requests are based on the receipt of the filing of Appellant Heath Causey's Final Brief on October 16, 2017.

Respondents appreciate the Court's consideration.

NATE FATA, P.A.



Nate Fata, Esq. (SC No. 009866)
Post Office Box 16620
Surfside Beach, SC 29587
843-238-2676

November 6, 2017

Attorney for Respondents

SECURITY FEATURES INCLUDE TRUE WATERMARK PAPER HEAT SENSITIVE MICRON AND FOIL HOLOGRAMS

13428

NATE FATA
NATE FATA, P.A.
THE COURTYARD SUITE 215
P.O. BOX 16620
MYRTLE BEACH, SC 29587-8620

DATE 11/6/17

87:231/332

MicroCheck symbol

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Court of Appeals

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Conway, South Carolina 29520



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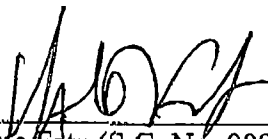
J. Floyd Swilley, J. Floyd Swilley Investment Advisors, Laurel K. Swilley, SMG Partners, LLC, SMS Services, LP, William C. Piner, WCP Limited, LLC, 809 Holdings, LP, QC Financing, LLC, Heath Causey, and Sage Financial Group, LLC, J. Floyd Swilley SMG Partners, LLC, Alicia A. Piner, Heath Causey, Sage 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

PROOF OF SERVICE

I certify that I have served the Notice of Motion and Motion For Seven Day Extension of Time To File Final Briefs on F. Miles Adler, Esquire and Heath Wendell Causey, Pro Se by depositing a copy of same in the United States Mail, postage prepaid, on November 6, 2017, addressed to F. Miles Adler, Esquire, Adler Law Firm, LLC, P.O. Box 4743, Pawleys Island, SC 29585 and Heath Wendell Causey, 1705 N. Oak Street, Suite 2, Myrtle Beach, SC 29577.

November 6, 2017



Nate Fata (S.C. No. 009866)

Nate Fata, P.A.

Post Office Box 16620

Surfside Beach, SC 29587

(843) 238-2676

Attorney for Respondents

NATE FATA, P.A.
ATTORNEY AT LAW

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VIA U.S. MAIL AND FACSIMILE

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NOV 06 2017

SC Court of Appeals

November 6, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

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

Re: Gabriel Barnhill and GSB Enterprises, LLC vs. Heath Wendell Causey
Appellate Case No. 2016-001377 (filed under 2016-001328)

Dear Ms. Kitchings:

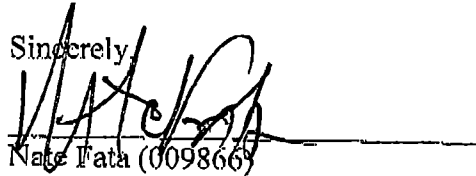
Enclosed for filing are an original and six copies of Respondents' Notice of Motion and Motion For Seven Day Extension of Time to file Final Briefs and Proof of Service. I respectfully request a seven (7) day extension to file Respondents' Final Briefs in J. Floyd Swilley, et al., and Heath Wendell Causey.

I enclose a check in the amount of \$25 for the filing fee.

The Honorable Jenny Abbott Kitchings
November 6, 2017
Page 2

We appreciate the Court's consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nate Fata', is written over a horizontal line.

Nate Fata (009866)

Nate Fata, P.A.

Post Office Box 16620

Surfside Beach, SC 29587

(843) 238-2676

Attorney for Respondents

cc:

F. Miles Adler, Esquire
Adler Law Firm, LLC
P.O. Box 4743
Pawleys Island, SC 29585
Attorney for Appellants

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

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TELECOPIER TRANSMITTAL

TO: South Carolina Court of Appeals
TELECOPIER NO.: 803-734-1839

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TO: F. Miles Adler, Esq.
TELECOPIER NO.: 843-314-3205

NOV 06 2017

FROM: Nate Fata

SC Court of Appeals

DATE: November 6, 2017

RE: Barnhill vs. Swilley, et al.
CA: 2014-CP-26-3362

NUMBER OF PAGES (TOTAL): 2 (including cover)

PLEASE CALL (843) 238-2676 IF ALL PAGES ARE NOT RECEIVED.

COMMENTS: PLEASE SEE ATTACHED

Nate Fata, P.A.
Tel. 843-238-2676

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