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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Cliffton Newman, Circuit Court Judge

Case No.: 2015-CP-10-05463

The Boathouse at Breach Inlet, LLC, by and through its member,  
Laurence O. Stoney, Jr.....Respondent,

v.

Richard S. W. Stoney, individually and as a member-manager of  
The Boathouse at Breach Inlet, LLC and Crew Carolina, LLC

and

Theodore Stoney, Jr., individually and as Trustee for Richard Stoney, Jr.  
and Gregory G. Holmes,  
Third-Party Intervenors

of whom

Richard S. W. Stoney is .....Appellant.

**RECEIVED**  
SEP 26 2019  
SC Court of Appeals

**MOTION FOR EXTENSION OF TIME TO FILE  
RETURN TO RESPONDENT'S MOTION TO DISMISS**

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Richard S. W. Stoney, moves this Court for an order granting an extension of time for Appellant to serve and file his Return to Respondent's Motion to Dismiss in the above-captioned action.

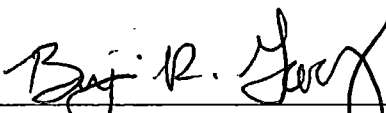
Currently, Appellant's Return is due on September 30, 2019. The undersigned counsel requests an extension of time of two days to file and serve Appellant's Return. If the Motion for Extension is granted as proposed, the new deadline for the Return will be October 2, 2019. This is Appellant's first request for an extension of this deadline.

Appellant seeks this request due to the fact that the undersigned counsel was only recently engaged to serve as appellate counsel and is currently working to review the pleadings, orders, and transcripts from the circuit court. Further, the undersigned counsel has longstanding obligations in other matters that restrict counsel's ability to prepare the Return. This includes the deposition of party opponent in a different matter and a hearing on a motion for summary judgment that is pending in yet another matter. For these reasons, Appellant asks this Court for the 2-day extension outlined above.

Appellant has consulted with Respondents' counsel regarding this request, and Respondents have no objection to the Court's grant of this extension.

Respectfully submitted,

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*Attorneys for Appellant Richard S. W. Stoney*

Columbia, South Carolina  
September 26, 2019

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

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and

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and Gregory G. Holmes,  
Third-Party Intervenors

of whom

Richard S. W. Stoney is .....Appellant.

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**PROOF OF SERVICE**

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I certify that I have caused the Motion for Extension of Time to File Return to Respondent's  
Motion to Dismiss to be served on Respondent by U.S. Mail and electronic mail on September 26,  
2019, addressed to their attorneys of record at the following address:

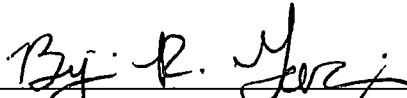
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Stafford J. McQuillin, III, Esquire  
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September 26, 2019

**BY HAND-DELIVERY**

Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
SFP 26 2019  
SC Court of Appeals

Re: Boathouse at Breach Inlet, LLC, et al. v. Stoney, et al.  
Case No.: 2015-CP-10-05463

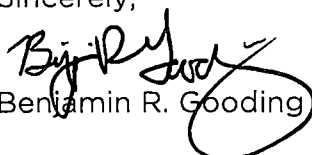
Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of a Motion for Extension of Time to File Return to Respondent's Motion to Dismiss and Proof of Service in the referenced matter.

I would appreciate your filing as appropriate and returning a clocked-in copy of each via our courier.

By copy of this letter, and as evidenced by the Proof of Service, I am serving same upon counsel of record.

Sincerely,

  
Benjamin R. Gooding

Enclosures

cc: Capers G. Barr, III, Esquire  
George J. Kefalos, Esquire  
Stafford J. McQuillin, III, Esquire  
Scott Y. Barnes, Esquire  
Tyler K. Gilliam, Esquire  
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