

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Clifton Newman

---

C.A. No.: 2015-CP-10-05463

---

**RECEIVED**  
**Oct 19 2020**  
SC Court of Appeals

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

v.

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

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, individually and as Member-manager of The  
Boathouse at Breach Inlet, LLC is ..... Respondent.

---

**CONSENT MOTION FOR SECOND EXTENSION OF TIME FOR APPELLANT  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

---

The appellant's initial brief and designation of matter are currently due on November 4,  
2020. Due to current workload obligations, Appellant respectfully requests a second thirty-day  
extension of time in which to file its initial brief and designation of matter to be included in the

record on appeal, making them due on December 4, 2020. Counsel for Respondent has graciously consented to this request. Appellant asks that current filing deadlines be stayed pending resolution of this motion

Respectfully Submitted,

**HAYNSWORTH SINKLER BOYD, P.A.**

s/ Sarah P. Spruill

Sarah P. Spruill, S.C. Bar No. 68337

P.O. Box 2048

Greenville, South Carolina 29602-2048

Telephone: (864) 240-3200

[sspruill@hsblawfirm.com](mailto:sspruill@hsblawfirm.com)

Scott Y. Barnes, S.C. Bar No. 528

Stafford J. McQuillin III, S.C. Bar No. 78203

Tyler K. Gilliam, S.C. Bar No. 103170

P.O. Box 340

Charleston, SC 29402

(843) 724-1120

[sbarnes@hsblawfirm.com](mailto:sbarnes@hsblawfirm.com)

[mmcquillin@hsblawfirm.com](mailto:mmcquillin@hsblawfirm.com)

[tgilliam@hsblawfirm.com](mailto:tgilliam@hsblawfirm.com)

*Attorneys for Appellant*

October 19, 2020  
Greenville, South Carolina

Other Counsel of Record:

Capers G. Barr, III  
Barr, Unger & McIntosh, LLC  
11 Broad Street (29401)  
P.O. Box 1037  
Charleston, SC 29402  
(843) 577-5083  
[cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

*Attorneys for Richard S.W. Stoney, Sr. and Crew Carolina, LLC*

George J. Kefalos  
George J. Kefalos P.A.  
46-A State Street  
Charleston, SC 29401  
[george@kefaloslaw.com](mailto:george@kefaloslaw.com)

*Attorneys for Gregory G. Holmes and Theodore D. Stoney*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Clifton Newman

---

C.A. No.: 2015-CP-10-05463

---

**RECEIVED**

**Oct 19 2020**

**SC Court of Appeals**

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

v.

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

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, individually and as Member-manager of The  
Boathouse at Breach Inlet, LLC is ..... Respondent.

---

**PROOF OF SERVICE**

---

I certify that I have served the *Consent Motion for Second Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal* on all attorneys of record via electronic mail only, on October 19, 2020, addressed to:

<p>Capers G. Barr, III Barr, Unger &amp; McIntosh, LLC P.O. Box 1037 Charleston, SC 29402 (843) 577-5083 <a href="mailto:cgb@barrungermcintosh.com">cgb@barrungermcintosh.com</a></p>	<p>George J. Kefalos George J. Kefalos P.A. 46-A State Street Charleston, SC 29401 (843) 722-6612 <a href="mailto:george@kefaloslaw.com">george@kefaloslaw.com</a></p>
---	--



Janice Barry, Legal Secretary  
HAYNSWORTH SINKLER BOYD, P.A.  
ONE North Main Street, 2<sup>nd</sup> Floor  
Greenville, SC 29601  
864.240.3223

Haynsworth  
Sinkler Boyd, P.A.

ATTORNEYS AND COUNSELORS AT LAW

ONE NORTH MAIN, 2ND FLOOR (29601-2772)  
POST OFFICE BOX 2048 (29602-2048)  
GREENVILLE, SOUTH CAROLINA  
TELEPHONE 864.240.3200  
FACSIMILE 864.240.3300  
www.hsblawfirm.com

SARAH P. SPRUILL  
ATTORNEY  
DIRECT DIAL NUMBER 864.240.3220  
sspruill@hsblawfirm.com

October 19, 2020

**VIA EMAIL ONLY ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RECEIVED**  
**Oct 19 2020**  
**SC Court of Appeals**

Re: *The Boathouse at Breach Inlet, LLC, et al. v. Richard S.W. Stoney, et al.*  
Appellant Case No.: 2020-001203

Dear Ms. Kitchings:

This firm represents the Appellant, The Boathouse at Breach Inlet, LLC, et al., in the above matter. Enclosed for filing, please find a *Consent Motion for Second Extension of Time to File Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal*, together with our Proof of Service for the same. We have not included a filing fee consistent with the Supreme Court of South Carolina's Order dated March 20, 2020.

If you have any questions, please give me a call. Thank you for your assistance in this matter. Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadline be stayed pending resolution of this request.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/jmb  
Attachments

cc: Capers G. Barr, III (via email only [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com))  
George J. Kefalos (via email only [george@kefaloslaw.com](mailto:george@kefaloslaw.com))