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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

ON PETITION FOR WRIT OF CERTIORARI TO THE COURT OF APPEALS  
APPEAL FROM HORRY COUNTY  
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Court of Appeals Appellate Case No. 2016-001328

Gabriel Barnhill and 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, ..... Defendants.

Of whom J. Floyd Swilley and Laurel K. Swilley are the ..... Petitioners.

**MOTION FOR EXTENSION OF TIME TO FILE  
PETITION FOR A WRIT OF CERTIORARI**

Petitioners, by and through undersigned counsel, hereby moves this Court for a fifteen (15) day extension of time within which Petitioner may file a Petition for a Writ of Certiorari.

Petitioners retained the undersigned on or about September 30, 2021, to represent them in connection with a Petition for Writ of Certiorari as it relates to an unpublished decision of the Court of Appeals (Opinion No. 21-UP-288) dated August 4, 2021, and the Court of Appeals' denial of Petition for Rehearing dated September 8, 2021. The undersigned has been able to review the file materials sufficiently to believe there is merit to the issues Petitioners wish to raise on certiorari to this Court.

The undersigned has an unusually high volume of work of late (although it seems like it is an ever-ending situation) and has been hampered by her law partner testing positive for COVID and experiencing COVID symptoms, so she is trying to leave him alone. Finally, to make matters worse, her office is attempting this week to transition to a new software system after more than 20 years using an older case management system, and that has made her life miserable.

The undersigned has reached out today to opposing counsel Nate Fata to inquire if he will consent to the relief being requested. At the time of this filing, a response had not yet been received. The undersigned will update the Court with any feedback obtained.

The undersigned is informed and believes that good cause exists to grant an additional 15 days for filing the Petition for Writ of Certiorari, which she understands is currently October 8, 2021. If granted, the new deadline would be October 25, 2021. However, any extension the Court is willing to grant is appreciated.

Accordingly, for the reasons set forth herein, Petitioner respectfully requests additional time to file the Petition for a Writ of Certiorari and seeks a fifteen (15) day enlargement of time.

Respectfully submitted,

s/ Desa Ballard  
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ATTORNEYS FOR PETITIONERS

October 5, 2021