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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

Appellate Case No. 2021-001124

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, Laurel K. Swilley and Heath Causey are the Petitioners.

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

Petitioners, by and through undersigned counsel, hereby moves this Court for a five (5) day extension of time within which Petitioner may file a Reply to Return to Petition for a Writ of Certiorari.

Petitioners filed their Petition for Writ of Certiorari on October 25, 2021, and amended it on October 26, 2021. Respondents filed a response which was received on November 23, 2021, just before the beginning of the Thanksgiving holiday. On information and belief, Petitioner's reply is due on Friday, December 3, 2021.

Due to the holiday break and other burdens of work, Petitioner's counsel seeks additional time to file the Reply.

The undersigned is informed and believes that good cause exists to grant an additional 5 days for filing the Reply to Return to Petition for Writ of Certiorari, which she understands is currently due December 3, 2021. If granted, the new deadline would be December 8, 2021.

Counsel has not consulted with opposing counsel in an effort to gain consent to the relief sought here because the content of the Response to the Petition for Writ of Certiorari convinces counsel that seeking consent would serve no useful purpose.

Accordingly, for the reasons set forth herein, Petitioner respectfully requests additional time to file the Reply to Return to Petition for a Writ of Certiorari and seeks a five (5) day enlargement of time.

Respectfully submitted,

s/ Desa Ballard
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December 2, 2021