THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMERIS BANK, Plaintiff / Counterclaim Defendant, v. PATRICK E. BYRNE, THE PATRICK E. BYRNE REVOCABLE TRUST U/T/A DATED FEBRUARY 23, 2001, and THE PATRICK E. BYRNE IRREVOCABLE TRUST U/T/A DATED JULY 22, 2021, Defendants / Counterclaim Plaintiffs.	Case No. 1:26-cv-00190-JLH (Consolidated)

DEFENDANTS/COUNTERCLAIM PLAINTIFFS' MOTION
FOR LEAVE TO FILE COUNTERCLAIMS / SECOND AMENDED COMPLAINT

Pursuant to Rule 15 of the Federal Rules of Civil Procedure, Defendants/Counterclaim Plaintiffs[1] respectfully move for entry of an Order (i) granting them leave to file Counterclaims / Second Amended Complaint (the "SAC"), a copy of which is attached hereto as Exhibit 1,[2] and (ii) directing Ameris to answer the SAC. The grounds for this Motion are set forth in the accompanying Opening Brief, which is incorporated by reference.

[*Signature on following page*]

[1] "Defendants/Counterclaim Plaintiffs" refers, collectively, to Patrick E. Byrne, The Patrick E. Byrne Revocable Trust U/T/A dated February 23, 2001, and The Patrick E. Byrne Irrevocable Trust U/T/A dated July 22, 2021. "Ameris" refers to Plaintiff/Counterclaim Defendant Ameris Bank.

[2] A redline showing changes made between Defendants/Counterclaim Plaintiffs' First and Second Amended Complaints is attached hereto as Exhibit 2.

Dated: September 30, 2026

Respectfully submitted,

REED SMITH LLP

/s/ Benjamin P. Chapple

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