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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Jennifer B. McCoy

Appellate Case No. 2021-001050
Common Pleas Case No. 2016-CP-10-03783

The Retreat at Charleston National Country Club Home Owners Association, Inc. and The
Retreat at Charleston National Country Club Horizontal Property Regime..... Plaintiffs,

v.

Winston Carlyle Charleston National, LLC; Colin R. Campbell Construction, Inc.; Colin Campbell,
Individually; C.R. Campbell Construction Co., Inc.; Colin Campbell Construction, LLC; Builders
FirstSource-Southeast Group, LLC; Builders FirstSource, Inc.; Americo Roofing Concepts, Inc.;
DVS, Inc.; Advanced Building Connection, LLC; Guy C. Lee Building Materials, LLC; WS
Contractors, LLC; Dino Schwartz, Individually; ECC Contracting, LLC; Hurley Services, LLC;
McDaniel Construction Co., LLC; AC Construction Corp.; AC Construction, Inc.; L&G
Construction Group, LLC; Liollo Architecture; JC Construction d/b/a JC Construction, LLC a/k/a
JC Contractors a/k/a JC Contractors, LLC; Soto & Vasquez Construction, LLC a/k/a Costa De
Oliveira Construction, LLC a/k/a Costa De Oliveira Construction, LLC; Solesmar Jesus De Oliveira;
Wilson Lucas Sales d/b/a Miracle Siding; Miracle Siding, LLC; Royal Homes of SC, Inc.; Colleen
Batissa; Christopher Batissa; Norma Ferreira Bruno; Mendez Construction, LLC; Juan Garza Ramos;
Juan Garza Ramos d/b/a Juan Constructors; Jessica Marroquin; Jessica Marroquin d/b/a Marroquin
Construction; Carlos Marroquin; Carlos Marroquin and Jessica Marroquin d/b/a Marroquin
Construction; Feliciano Cruz Silva Garcia Roofing, LLC; Givair De
Caris; and Mario Salgado..... Defendants,

Builders FirstSource-Southeast Group, LLC..... Third-Party Plaintiff, Appellant,

v.

Pohlman Quality Contractors; Pohlman Quality Exteriors; Palmetto Trim and Renovation; Edward
Bruce Witham; and East Coast Carpentry..... Third-Party Defendants,

Of which Palmetto Trim and Renovation; Hurley Services, LLC; ECC Contracting, LLC; East Coast Carpentry; AC Construction, Inc.; WS Contractors, LLC; Pohlman Quality Exteriors, Inc.; and L&G Construction Group, LLC are the.....Respondents.

APPELLANT BUILDERS FIRSTSOURCE-SOUTHEAST GROUP, LLC’S MOTION
TO EXCEED PAGE LIMITATION FOR REPLY BRIEF

Appellant Builders FirstSource-Southeast Group, LLC respectfully submits this motion for permission to exceed the 25-page limitation for its reply brief in the above-captioned appeal. South Carolina Appellate Court Rule 208(b)(5) generally limits reply briefs to 25 pages but provides that “[o]n motion, the appellate court may grant a party permission to exceed those limitations.”

The basis for Appellant’s motion is that Appellant is in the unique position of writing one Reply Brief that responds to the seven different briefs submitted by Respondents. Because of the extraordinary circumstances imposed by the scope and diversity of Respondents’ arguments, it has become obvious to Appellant in the course of drafting its reply brief that Appellant will require slightly more than the 25 pages allotted by Rule 208 to respond comprehensively to said arguments.

WHEREFORE, Appellant Builders FirstSource-Southeast Group, LLC respectfully requests that the Court grant permission to exceed the page limitation imposed by Rule 208 on its Reply Brief.

SIGNATURE PAGE TO FOLLOW

Respectfully submitted,

HOWELL, GIBSON & HUGHES, PA

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Ramos; Juan Garza Ramos d/b/a Juan Constructors; Jessica Marroquin; Jessica Marroquin d/b/a
Marroquin Construction; Carlos Marroquin; Carlos Marroquin and Jessica Marroquin d/b/a
Marroquin Construction; Feliciano Cruz Silva Garcia Roofing, LLC; Givair De
Caris; and Mario Salgado..... Defendants,

Builders FirstSource-Southeast Group, LLC Third-Party Plaintiff, Appellant,

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Bruce Witham; and East Coast Carpentry Third-Party Defendants,

Of which Palmetto Trim and Renovation; Hurley Services, LLC; ECC Contracting, LLC; East Coast Carpentry; AC Construction, Inc.; WS Contractors, LLC; Pohlman Quality Exteriors, Inc.; and L&G Construction Group, LLC are the.....Respondents.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certify that they have served Appellant Builders FirstSource-Southeast Group, LLC’s **“BUILDERS FIRSTSOURCE-SOUTHEAST GROUP, LLC’S MOTION TO EXCEED PAGE LIMITATION FOR REPLY BRIEF”** upon all counsel of record via electronic mail only to counsels’ last known email address on this 14th day of July, 2022.

Respectfully submitted,

HOWELL, GIBSON & HUGHES, PA

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