

**RECEIVED**

**Aug 09 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Debra R. McCaslin, Circuit Court Judge

---

Appellate Case No.: 2022-000087

---

ARM Quality Builders, LLC d/b/a ARM Quality Builders,

Appellant,

vs.

First Citizens Bank,

Respondent.

---

**MOTION FOR EXTENSION OF TIME  
TO FILE RECORD ON APPEAL**

---

Pursuant to Rules 240 and 263(b) of the South Carolina Appellate Court Rules, Appellant and Third-Party Appellant moves this Court for an Order granting thirty (30) days for the Appellant file and serve the Record on Appeal in the above-captioned appeal. This request is being made due to counsel's present workload, having to testify as an expert witness in a case, and other professional commitments. This is the Appellant's first request for an extension of time.

The Record on Appeal of matter is currently due on August 11, 2022. If the motion is granted, Appellant's would file the Record on Appeal will be due on September 10, 2022.

DAVIS FRAWLEY, LLC

By: 

James Randall Davis  
[randy@oldcourthouse.com](mailto:randy@oldcourthouse.com)  
140 East Main Street (29072)  
Post Office Box 489  
Lexington, South Carolina 29071  
Tel: (803) 359-2512  
**Attorney for Appellant**

August 9, 2022

Other Counsel of Record:  
William S. Brown, Esquire  
Samuel W. Outten, Esquire  
2 W. Washington Street, Suite 400  
Post Office Box 10084  
Greenville, SC 29603  
Attorneys for Respondent

**RECEIVED**  
**Aug 09 2022**  
**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Debra R. McCaslin, Circuit Court Judge

Case No.: 2020-CP-32-03441

Ahmad Mazloom and ARM Quality Builders, LLC ..... Appellants.

v.

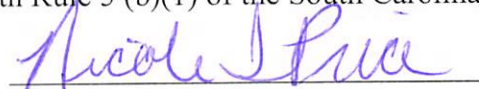
First Citizens Bank..... Respondent.

**PROOF OF SERVICE**

I, Nicole T. Price, a paralegal with the law firm of DAVIS | FRAWLEY, LLC, do hereby certify that I have served the following with the foregoing **NOTICE OF MOTION FOR EXTENSION OF TIME TO FILE RECORD ON APPEAL** by electronic mail and depositing the same in the United States mail, with sufficient postage attached thereto, to them at the following address:

Samuel W. Outten, Esquire  
William S. Brown, Esquire  
2 W. Washington Street, Suite 400  
Post Office Box 10084  
Greenville, SC 29603  
Attorneys for Respondent

on this 9<sup>th</sup> day of August, 2022 all in accordance with Rule 5 (b)(1) of the South Carolina Rules of Civil Procedure.



Nicole T. Price, Paralegal  
DAVIS | FRAWLEY, LLC  
140 East Main Street  
Lexington, South Carolina 29071

Lexington, South Carolina

ATTORNEYS FOR APPELLANTS

James Randall Davis  
Patrick J. Frawley  
Jeff M. Anderson  
John J. McCauley ◊  
Carey M. Ayer Δ  
Ryan M. Wingard  
Evan M. Gessner  
Matthew G. Rogers



**Of Counsel**  
George S. Nicholson, Jr.

Francis C. Jones  
(1919 – 1968)

Hubert E. Long  
(1921 – 2000)  
Robert K. Bouknight  
(1931-2019)  
Since 1961

◊ American Board of Trial Advocates  
Δ Certified Circuit Court Mediator

August 9, 2022

**VIA US MAIL AND ELECTRONIC MAIL**

South Carolina Court of Appeals  
Attn: The Honorable Jenny Abbott Kitchings  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Aug 09 2022**  
**SC Court of Appeals**

RE: Ahmad Mazloom and ARM Quality Builders, LLC v. First Citizens Bank  
Appellate Case No.: 2022-000087  
Our File No.: 30909

Dear Ms. Kitchings:

Enclosed, please find the Notice of Motion and Motion for Extension of Time to File Record on Appeal and Proof of Service in regards to the above referenced matter. By copy of this letter, I am serving counsel for the Respondent with the same. Also enclosed is our check in the amount of \$50.00 for the filing costs associated with this matter. Please let me know if the Court requires anything further.

Sincerely,

Nicole T. Price  
Paralegal

cc: William S. Brown, Esquire  
Samuel W. Outten, Esquire  
Miles E. Coleman, Esquire  
Abigail L. Wood, Esquire  
2 W. Washington Street, Suite 400  
Post Office Box 10084  
Greenville, SC 29603  
Attorneys for Respondent