

**RECEIVED**  
**Aug 31 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

---

Appellate Case No. 2022-000290  
Case No. 2020-CP-46-02006

---

Eastwood Construction Partners, LLC and  
Eastwood Development Corporation, ..... Appellants,

v.

GHD Brooks Creek, a North Carolina Limited Liability Company, and AF-Brooks  
Creek, LLC, a North Carolina Limited Liability Company, GHD River Falls, a  
North Carolina Limited Liability Company, and AF-River Falls, LLC, a North  
Carolina Limited Liability Company, Greenhawk Corporation, Inc. and  
TRI Pointe Homes, Inc., ..... Respondents.

---

**APPELLANTS' MOTION FOR EXTENSION TO FILE  
RECORD ON APPEAL**

---

Appellants Eastwood Construction Partners, LLC and Eastwood Development Corporation respectfully move this Court for an extension of time to file and serve the Record on Appeal.

The Appellants' motion is based on the grounds that Counsel for Appellants require additional time to prepare the Record on Appeal due to very active caseloads, and would respectfully request an additional fifteen (15) days to complete, file and serve these pleadings. This is the first request for an extension in this matter. By our calculations, the new deadline would be September 15, 2022.

WHEREFORE, the Appellants respectfully request that they be granted an additional fifteen (15) days to file the Record on Appeal making the Record on Appeal due September 15, 2022.

Respectfully submitted,

August 31, 2022

s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
Moore Bradley Myers Law Firm, P.A.  
P.O. Box 5709  
West Columbia, SC 29171  
(803) 796-9160  
[ward@mbmlawsc.com](mailto:ward@mbmlawsc.com)

James C. Adams, II (NC Bar 18063)  
Brooks Pierce McLendon & Leonard, LLP  
PO Box 26000  
Greensboro, NC 27420  
(336) 271-3117  
[jadams@brookspierce.com](mailto:jadams@brookspierce.com)  
*Admitted Pro Hac Vice*

Attorneys for Appellants

**RECEIVED**

**Aug 31 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM YORK COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

Ct. App. No. 2022-000290

Eastwood Construction Partners, LLC and  
Eastwood Development Corporation, ..... Appellants,

v.

GHD Brooks Creek, a North Carolina Limited Liability Company,  
and AF-Brooks Creek, LLC, a North Carolina Limited Liability Company,  
GHD River Falls, a North Carolina Limited Liability Company, and  
AF-River Falls, LLC, a North Carolina Limited Liability Company,  
Greenhawk Corporation, Inc., and TRI Pointe Homes, Inc., ..... Respondents.

**PROOF OF SERVICE**

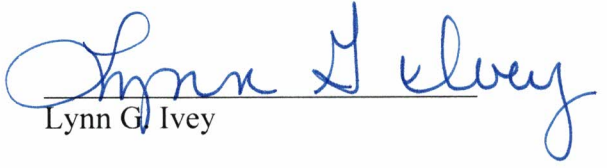
I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellants’ Motion for Extension of time to File Record on Appeal on the Respondents by depositing a copy of same in the United States Mail, postage prepaid, on August 31, 2022, addressed to their attorneys of record as follows:

Andrew A. Mathias  
Konstantine P. Diamaduros  
Nexsen Pruet, LLC  
PO Box 10648  
Greenville, SC 29603-0648

Stephen M. Cox  
Robinson, Bradshaw & Hinson, PA  
PO Box 12070  
Rock Hill, SC 29731

John I. Mabe  
Nexsen Pruet, LLC  
4141 Parklake Ave., Suite 200  
Raleigh, NC 27612

Amanda P. Nitto  
Robinson, Bradshaw & Hinson, PA  
101 N. Tryon Street, Suite 1900  
Charlotte, NC 28246

  
Lynn G. Ivey

West Columbia, South Carolina  
August 31, 2022

RECEIVED

Aug 31 2022

SC Court of Appeals



S. Jahue Moore\*  
James Edward Bradley\*  
Sheila McNair Robinson  
Christian G. Spradley  
William H. Edwards  
Stanley L. Myers  
Jane H. Downey\*  
S. Jahue Moore, Jr.  
William B. Fortino  
Ralph Nichols Riley, Jr.  
John C. Bradley, Jr.

August 31, 2022

Melissa K. Moore  
Lester McGill Bell, Jr.  
Bryan C. Letteer  
Sierra D. Carini  
Lawrence D. Turner  
Emily E. Collins

*Retired*

J. Mark Taylor\*\*  
Robert D. Hazel\*  
C. David Sawyer, Jr.\*  
Billy C. Coleman (1916-2019)

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
Via US Mail and Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

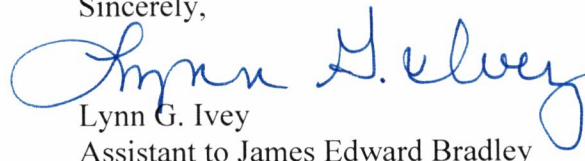
Re: Eastwood Construction Partners, LLC and Eastwood Development Corporation, v. GHD Brooks Creek, a North Carolina Limited Liability Company, and AF-Brooks Creek, LLC, a North Carolina Limited Liability Company, GHD River Falls, a North Carolina Limited Liability Company, and AF-River Falls, LLC, a North Carolina Limited Liability Company, Greenhawk Corporation, Inc., and TRI Pointe Homes, Inc.  
Ct. App. No. 2022-000290

Dear Ms. Kitchings:

I hope you are well. We are filing a motion for an extension in the above referenced matter by email today. Our firm check in the amount of \$50 is being mailed to your office under cover of this letter.

Please contact our office with any questions or concerns. Thank you for your assistance with this filing.

Sincerely,



Lynn G. Ivey  
Assistant to James Edward Bradley

Enclosure

cc: Allen Nason (via email)  
James Adams, Esquire (via email)  
John Mabe, Esquire  
Stephen Cox, Esquire  
Andrew A. Mathias, Esquire  
Konstantine P. Diamaduros, Esquire  
Amanda Nitto, Esquire

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171

TEL 803.796.9160 FAX 803.791.8410 [www.mbmlawsc.com](http://www.mbmlawsc.com)