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Nov 17 2023

THE STATE OF SOUTH CAROLINA S.C. SUPREME COURT

In The Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2019-001790

Civil Action No. 2015-CP-10-00955

Palmetto Pointe At Peas Island Condominium Property Owners Association, Inc. And Jack Love, Individually, and on behalf of all others similarly situated, ..... Plaintiffs,

vs.

Island Pointe, LLC; Complete Building Corporation; Tri-County Roofing, Inc.; Creekside, Inc; American Residential Services, LLC d/b/a ARS/Rescue Rooter Charleston; Andersen Windows, Inc; Atlantic Building Construction Services, Inc., n/k/a Atlantic Construction Services, Inc.; Builder Services Group, Inc. d/b/a Gale Contractor Services; Novus Architects, Inc., f/k/a SGM Architects, Inc.; Tallent and Sons, Inc; W C Services, Inc.; CRG Engineering, Inc; CertainTeed Corporation; Kelly Flooring Products, Inc, d/b/a Carpet Baggers; Cornerstone Construction and Mark Malloy d/b/a Cornerstone Construction; Miracle Siding, LLC and Wilson Lucas Sales d/b/a Miracle Siding, LLC; Mark Palpoint a/k/a Micah Palpoint; Elroy Alonzo Vasquez; Chris a/k/a John Doe 61; Alderman Construction; Stanley's Vinyl Fence Designs; Cohen's Drywall Company, Inc; Mosely Concrete; Hand A Framing Construction, LLC a/k/a H&A Framing Construction, LLC and d/b/a H and A Framing, LLC, H&A Construction, and Hand A Construction; JMC Construction, Inc; JMC Construction, LLC; John Doe 1—15, ..... Defendants,

of which Palmetto Pointe At Peas Island Condominium Property Owners Association, Inc. and Jack Love, individually, and on behalf of all others similarly situated are the Respondents,

and

Tri-County Roofing, Inc. .... Petitioner,

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**PETITIONER'S MOTION FOR EXTENSION OF TIME TO FILE REPLY  
TO RETURN TO PETITION FOR WRIT OF CERTIORARI**

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YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorneys for the Petitioner, moves this Court for an Order extending time to file Petitioner's Reply to Return to Petition for Writ of Certiorari currently due on November 17, 2023. The basis of this motion is due to Petitioner's current schedule.

WHEREFORE, Petitioner respectfully requests this Court issue an Order granting Petitioner an extension until November 30, 2023 to file Petitioner's Reply to Return to Petition for Writ of Certiorari. This is Petitioner's first request for an extension in this matter. Petitioner's counsel has consulted with Respondent's counsel and Respondent's counsel does not object to this request for an extension.

Respectfully submitted,  
COLLINS & LACY, P.C.

By: 

CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
JAMES L. WILLIAMS  
[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)  
Post Office Box 12487  
Columbia, SC 29211  
803.256.2660 (voice)  
803.771.4484 (fax)

ATTORNEYS FOR PETITIONER TRI-  
COUNTY ROOFING, INC.

November 17, 2023  
Columbia, South Carolina

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American Residential Services, LLC d/b/a ARS/Rescue Rooter Charleston; Andersen Windows,  
Inc; Atlantic Building Construction Services, Inc., n/k/a Atlantic Construction Services, Inc.;  
Builder Services Group, Inc. d/b/a Gale Contractor Services; Novus Architects, Inc., f/k/a SGM  
Architects, Inc.; Tallent and Sons, Inc; W C Services, Inc.; CRG Engineering, Inc; CertainTeed  
Corporation; Kelly Flooring Products, Inc, d/b/a Carpet Baggers; Cornerstone Construction and  
Mark Malloy d/b/a Cornerstone Construction; Miracle Siding, LLC and Wilson Lucas Sales d/b/a  
Miracle Siding, LLC; Mark Palpoint a/k/a Micah Palpoint; Elroy Alonzo Vasquez; Chris a/k/a  
John Doe 61; Alderman Construction; Stanley's Vinyl Fence Designs; Cohen's Drywall Company,  
Inc; Mosely Concrete; Hand A Framing Construction, LLC a/k/a H&A Framing Construction,  
LLC and d/b/a H and A Framing, LLC, H&A Construction, and Hand A Construction; JMC  
Construction, Inc; JMC Construction, LLC; John Doe 1—15, ..... Defendants,

of which Palmetto Pointe At Peas Island Condominium Property Owners Association, Inc. and  
Jack Love, individually, and on behalf of all others similarly situated are the Respondents,

and

Tri-County Roofing, Inc. .... Appellant.

**PROOF OF SERVICE**

I certify that I have served a true copy of **Petitioner's Motion for Extension of Time to File Reply to Return to Petition for Writ of Certiorari** upon all parties via email, on November 17, 2023, addressed as follows:

Respectfully submitted,  
COLLINS & LACY, P.C.

By: \_\_\_\_\_

  
CHRISTIAN STEGMAIER  
[cstegmaier@collinsandlacy.com](mailto:cstegmaier@collinsandlacy.com)  
JAMES L. WILLIAMS  
[jwilliams@collinsandlacy.com](mailto:jwilliams@collinsandlacy.com)  
Post Office Box 12487  
Columbia, SC 29211  
803.256.2660 (voice)  
803.771.4484 (fax)

ATTORNEYS FOR PETITIONER TRI-  
COUNTY ROOFING, INC.

Other Counsel of Record:

Justin O. Lucey, Esquire  
Stephanie Drawdy, Esquire  
Joshua F. Evans, Esquire  
Lucey Law Firm  
415 Mill Street  
Mt. Pleasant, SC 29464  
[jlucey@lucey-law.com](mailto:jlucey@lucey-law.com)  
[sdrawdy@lucey-law.com](mailto:sdrawdy@lucey-law.com)  
[jevans@lucey-law.com](mailto:jevans@lucey-law.com)

-and-

Edward D. Buckley, Jr., Esquire  
Post Office Box 993  
Charleston, SC 29402  
[ebuckley@yctrlaw.com](mailto:ebuckley@yctrlaw.com)  
*Counsel for Palmetto Pointe At Peas Island Condominium  
Property Owners Association, Inc. And Jack Love, Individually,  
and on behalf of all others similarly situated*