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Dec 20 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM Horry COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court Judge
Case No. 2018-CP-26-00307

Appellate Case No. 2023-001150

Wedgewood Condominium Association, Appellant

vs.

Centex Homes, a Nevada General Partnership; Balfour Beatty Construction, LLC as
successor by merger to Centex Construction Company, Inc. and Centex Construction, LLC;
Crescent Engineering, Inc., Defendants.

OF WHICH:

Centex Homes, a Nevada General Partnership; Balfour Beatty Construction, LLC as
successor by merger to Centex Construction Company, Inc. and Centex Construction, LLC,
are..... Respondents

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT’S REPLY BRIEF**

YOU WILL PLEASE TAKE NOTICE that the undersigned, as attorney for Appellant
Wedgewood Condominium Association moves this Court for an Order extending the time to file
Appellant’s Reply Brief currently due on December 21, 2023 in the captioned appeal. Respondent’s
Initial Brief and Designation of Matter were received by Appellant’s counsel on December 11, 2023.
Appellant’s counsel’s involvement in an eight-day trial has not allowed him sufficient time to review
Respondent’s Initial Brief and adequately prepare Appellant’s Reply Brief.

WHEREFORE, Appellant's counsel respectfully requests this Court grant Appellant an extension of time to file Appellant's Reply Brief up to and including January 5, 2024 (which would accommodate office closures for the Christmas and New Year holidays). This Motion is made in good faith and not for purposes of delay.

Respectfully submitted,

KELAHER, CONNELL & CONNOR, P.C.

s/Gene M. Connell, Jr.

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December 20, 2023

**Attorneys for Appellant Wedgewood
Condominium Association**

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successor by merger to Centex Construction Company, Inc. and Centex Construction, LLC,
are..... Respondents


PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes
and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy
of **Motion for Extension to File Appellant’s Reply Brief of** on the 20th day of December, 2023, by
depositing a copy of same in the United States Mail, postage prepaid, to:

Thomas C. Hildebrand, Jr., Esquire
William G. DesChamps, IV, Esquire
Paul N. Nybo, Esquire
Parker Poe Adams & Bernstein, LLP
850 Morrison Drive, Suite 400
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Katon E. Dawson, Jr. Esquire
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1221 Main Street, Suite 1100
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Stephanie A. Douglas, Esquire
Jeffrey A. Turner, Esquire
Bush Seyferth PLLC
100 W. Big Beaver Road, Suite 400
Troy, MI 48084



Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 20th day of December, 2023.



Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

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SC Court of Appeals

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December 20, 2023

ctappfilings@sccourts.org

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appellate Case No. 2023-001150
Wedgewood Condominium Association v. Centex Homes, et al.
C/A No. 2018-CP-26-00307
Our File No. 2018-0272C

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for Extension of Time to File Appellant's Reply Brief and Proof of Service in the above-captioned matter. Our check for the \$50.00 filing fee is being mailed this date.

By copy of this letter, we hereby serve Appellant's Motion for Extension on counsel of record.

Should you have any question or need anything further at this time, please do not hesitate to contact me.

Sincerely yours,

s/Gene M. Connell, Jr.

Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc w/enc.: Thomas C. Hildebrand, Jr., Esquire
William G. DesChamps, IV, Esquire
Paul N. Nybo, Esquire
Katon E. Dawson, Jr., Esquire
Jeffrey A. Turner, Esquire (Pro Hac Vice)
Stephanie A. Douglas, Esquire (Pro Hac Vice)
Stacy L. Stanley, Esquire