

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

**RECEIVED**

Appeal from Beaufort County  
Court of Common Pleas

**Jan 19 2024**

Carmen T. Mullen, Circuit Court Judge

**S.C. SUPREME COURT**

Case No. 2019-CP-07-00223

Court of Appeals Case No. 2020-001659

Tracey Lee Lunenburg,

Respondent,

v.

Vincent J. Aiello, Jr.,  
Atlantic Heritage Builders, Inc.,  
Yuko Construction, Inc., d/b/a Advanced Roofing, Inc.,  
Bismark Lara, Premium Stucco, and  
Shaw Manufacturing's Wrought Iron Works, Inc.,

Defendants.

Vincent J. Aiello, Jr., and  
Atlantic Heritage Builders, Inc.,

Third-Party Plaintiffs,

Palatial Homes, Inc., Palatial Homes, LLC,  
Palatial Homes Design, LLC, and  
Palatial Building Group, LLC,

Third-Party Defendants,

Of whom Vincent J. Aiello, Jr., and  
Atlantic Heritage Builders, Inc., are the

Petitioners.

**MOTION FOR EXTENSION OF TIME TO  
SERVE/FILE PETITION FOR A WRIT OF CERTIORARI**

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*Attorneys for Petitioners*

NOW COME Petitioners, Vincent J. Aiello, Jr., and Atlantic Heritage Builders, Inc., by and through their undersigned counsel, pursuant to Rule 263(b), SCACR, and the Court's order of July 16, 2014, regarding Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals, and, on the grounds stated below, hereby move for an extension of ten (10) days' time to file/serve their petition to this Court to issue a writ of certiorari to the Court of Appeals for review of its decision in this matter.

The Court of Appeals denied rehearing on December 21, 2023, making the deadline to file/serve a petition for a writ of certiorari Monday, January 22, 2024, pursuant to Rule 242(c), SCACR. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond January 22, 2024, to prepare Petitioners' petition for a writ of certiorari, and the undersigned submits there is good cause to allow the requested dispensation, as it is in furtherance of the interests of justice, it will not result in any undue prejudice to any other party, and it is consistent with the extension protocol established by the Court's aforementioned order of July 16, 2014.

WHEREFORE, Petitioners respectfully request that this Honorable Court grant them an extension of ten (10) days' time to file/serve their petition for a writ of certiorari. With the extension requested herein, the new deadline for filing/serving their petition for a writ of certiorari would be February 1, 2024, according to the undersigned's calculations. Further, Petitioners respectfully request that the Court hold the present deadline in abeyance until it acts on this motion.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully Submitted,  
CLEMENT RIVERS, LLP

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January 19, 2024