

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

**RECEIVED**

**Jan 19 2024**

**S.C. SUPREME COURT**

Appeal from Beaufort County  
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

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.

**PROOF OF SERVICE**

CLEMENT RIVERS, LLP  
Jason A. Daigle (SC Bar No. 73308)  
Nicholas J. Rivera (SC Bar No. 77186)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioners*

I, Russell G. Hines, of Clement Rivers, LLP, Attorneys for Petitioners, hereby certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** was served on Respondent on January 19, 2024, via email (see attached) to Respondent's counsel of record:

Thomas J. Finn, Esquire  
FINN LAW FIRM, PC  
[thomas@finnlawfirmpc.com](mailto:thomas@finnlawfirmpc.com)

*Attorney for Respondent*

I also certify that Petitioners' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR A WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on January 19, 2024, via email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Petitioners*

Charleston, South Carolina

January 19, 2024

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Friday, January 19, 2024 12:17 PM  
**To:** 'thomas@finnlawfirm.com'  
**Cc:** Hines, Russell; Justman, Aimee  
**Subject:** Lunenburg v. Aiello; Appellate Case No. 2020-001659 (CR 190474)  
**Attachments:** Motion for Extension - petition for writ of certiorari.pdf

Enclosed please find Petitioners' Motion for Extension Time to Serve/File Petition for a Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**  
25 Calhoun Street • Suite 200 • Charleston, SC 29401  
www.clementrivers.com