

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

RECEIVED

Appeal from Beaufort County
Court of Common Pleas

Feb 01 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.

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

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

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.

By order of this Court dated January 22, 2024, the deadline to file/serve a petition for a writ of certiorari is Thursday, February 1, 2024. Due to other time commitments, both work- and non-work-related, the undersigned counsel for Petitioners requests ten (10) additional days, beyond February 1, 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 12, 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

By: s/Russell G. Hines
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

Charleston, South Carolina

February 1, 2024