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Mar 15 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Presiding Judge

Appellate Case No. 2024-000369

Ralph Dawkins and Michelle Dawkins,  
Marcel Franquelin and Patricia Franquelin,  
Michael A. Martin and Adriana S. Iaquinto-Martin,  
Louis Glavinos and Kimberly Glavinos,  
Daniel J. O'Grady and Kaitlyn E. Grigoleit,  
Christopher M. Raybon and LaShonda K. Jones Raybon,  
Morris K. White and Rebecca A. White,  
Paul A. Banker and April D. Banker,  
Patrick K. Daly and Brenda Daly,..... Respondents,

v.

Eastwood Homes of Columbia, LLC d/b/a Eastwood Homes,  
Eastwood Construction Partners, LLC f/k/a Eastwood Construction LLC  
d/b/a Eastwood Homes, and Eastwood Construction, LLC,..... Appellants.

**APPELLANTS' MOTION FOR AN  
EXTENSION OF TIME TO FILE INITIAL BRIEF  
AND DESIGNATION OF MATTER**

Appellants Eastwood Homes of Columbia, LLC d/b/a Eastwood Homes, Eastwood Construction Partners, LLC f/k/a Eastwood Construction, LLC d/b/a Eastwood Homes, and Eastwood Construction, LLC, respectfully move this Court for an extension of time to file and serve their Initial Brief and Designation of Matter.

The Appellants' motion is based on the grounds that Counsel for Appellants requires additional time to prepare the Initial Brief and Designation of Matter due to a very active caseload and planned travel out of state, and would respectfully request an additional thirty (30) days to complete, file and serve these pleadings. This is the first request for an extension in this matter.

WHEREFORE, the Appellants respectfully request that they be granted an additional thirty (30) days to file their Initial Brief and Designation of Matter.

Respectfully submitted,

March 15, 2024

s/James Edward Bradley  
James Edward Bradley, SC Bar #66130  
Moore Bradley Myers Law Firm, PA  
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PO Box 5709  
West Columbia, SC 29171  
803-796-9160  
[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)  
*Attorney for Appellants*

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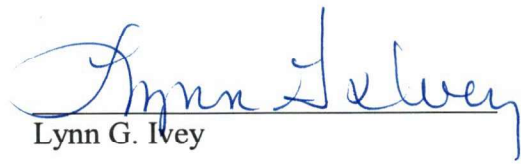
**PROOF OF SERVICE**

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I, Lynn G. Ivey, an employee of the Moore Bradley Myers Law Firm, P.A., certify that I have served the Appellants' Motion for an Extension of Time to File their Initial Brief and Designation of Matter on the Respondents by depositing a copy of same in the United States Mail, postage prepaid, on March 15, 2024, and via email addressed to their attorneys of record as follows:

Ross A. Appel, Esquire  
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McCullough Khan Appel  
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Lynn G. Ivey

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SC Court of Appeals



S. Jahue Moore†  
James Edward Bradley†  
Sheila McNair Robinson  
Christian G. Spradley  
William H. Edwards  
S. Jahue Moore, Jr.  
William B. Fortino  
Ralph Nichols Riley, Jr.  
John C. Bradley, Jr.  
Lester McGill Bell, Jr.

March 15, 2024

Melissa K. Moore  
Sierra D. Carini  
Lawrence D. Turner  
Emily E. Collins  
Erin R. Conroy

*Retired*

J. Mark Taylor\*\*  
Robert D. Hazel†  
C. David Sawyer, Jr.†  
Billy C. Coleman (1916-2019)  
Stanley L. Myers\*† (1976-2023)

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211  
Via Email and US Mail

Re: Ralph Dawkins and Michelle Dawkins, Marcel Franquelin and Patricia Franquelin, Michael A. Martin and Adriana S. Iaquinto-Martin, Louis Glavinos and Kimberly Glavinos, Daniel J. O'Grady and Kaitlyn E. Grigoleit, Christopher M. Raybon and LaShonda K. Jones Raybon, Morris K. White and Rebecca A. White, Paul A. Banker and April D. Banker, and Patrick K. Daly and Brenda Daly  
v.  
Eastwood Homes of Columbia, LLC d/b/a Eastwood Homes; Eastwood Construction Partners, LLC f/k/a Eastwood Construction LLC d/b/a Eastwood Homes; and Eastwood Construction, LLC  
Appellate Case No. 2024-000369

Dear Ms. Kitchings:

I hope you are well. Respondents wish to inform the Court that they are in possession of the necessary transcripts for this matter and will not need to place an order.

Respondents have filed by email this date a motion for an extension to file their Initial Brief and Designation of Matter. Our firm check is enclosed under cover of this letter for the motion fee.

Please contact our office with any questions or concerns. Thank you for your assistance with these filings.

Sincerely,

A handwritten signature in blue ink that reads 'Lynn G. Ivey'.

Lynn G. Ivey

Assistant to James Edward Bradley

Enclosure

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†Member of American Board of Trial Advocates \*Fellow of the American Academy of Matrimonial Lawyers \*\*Fellow, American College of Trial Lawyers †Retired

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
March 15, 2024  
Page 2

cc: Allen Nason (via email)  
Ross A. Appel, Esquire (via email)  
Jamie A. Khan, Esquire (via email)  
Michael T. Cooper, Esquire (via email)