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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
1700 Sunset Blvd. (29169)
PO Box 5709
West Columbia, SC 29171
803-796-9160
Ward@mbmlawsc.com
Attorney for Appellants

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d/b/a Eastwood Homes, and Eastwood Construction, LLC, Appellants.

PROOF OF SERVICE

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
Jamie A. Khan, Esquire
McCullough Khan Appel
2036 Wall Street
Mt. Pleasant, SC 29464
Ross@mklawsc.com
Jamie@mklawsc.com

Michael T. Cooper, Esquire
Apostolou Law Firm, LLC
3443 Rivers Ave.
North Charleston, SC 29405
michael@apostoloulaw.net


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'. The signature is fluid and cursive.

Lynn G. Ivey
Assistant to James Edward Bradley

Enclosure

1700 Sunset Boulevard, West Columbia SC 29169 | PO Box 5709, West Columbia SC 29171

TEL 803.796.9160 FAX 803.791.8410 www.mbmlawsc.com

*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)