

**RECEIVED**

**May 20 2024**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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APPEAL FROM BERKELEY COUNTY  
COURT OF COMMON PLEAS

The Honorable Bentley D. Price,  
Circuit Court Judge

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Appellate Case No. 2023-001832  
Case No.: 2018-CP-08-02423

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200 River Landing Drive Phase I Condominium Association, Inc., and Steven Garcia and Janis Zomber, individually and on behalf of all others similarly situated..... Respondents

v.

Watkins Services, Inc., First Exteriors, LLC, Getulio Perela Chagas, FBM Construction LLC d/b/a Fernando Monteiro, and John Doe Subcontractors or Material Suppliers 12-50.....Defendants

of Getulio Perela Chagas is the Appellant.

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**RESPONDENTS' REQUEST FOR EXTENSION OF TIME TO SERVE AND FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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**COMES NOW** the Respondents, 200 River Landing Drive Phase I Condominium Association, Inc., and Steven Garcia and Janis Zomber, individually and on behalf of all others similarly situated, who hereby request a thirty (30) day extension of time to serve and file their Initial Brief and Designation of Matter upon the Appellant, respectfully showing as follows:

1. This being Respondents' second request for extension, Respondents respectfully request that this Court issue an Order granting a thirty (30) day extension of time to file Respondents' Initial Brief and Designation of Matter.

**WHEREFORE** Respondents respectfully request that this Court issue an Order granting unto the Respondents a thirty (30) day extension to time to serve and file the Initial Brief and Designation of Matter.

THURMOND KIRCHNER & TIMBES, P.A.



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Attorneys for Respondents

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of Getulio Perela Chagas is the Appellant.

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**PROOF OF SERVICE**

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The undersigned certifies that she served a copy of the foregoing **Request for Extension of Time to Serve and File Respondents' Initial Brief and Designation of Matter** to all counsel of record on May 20, 2024, by mailing a copy of same, electronically or with proper postage affixed thereto, as follows:

Christopher C. Mingledorff (SC Bar No.: 100390)  
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Attorney for Appellant

THURMOND KIRCHNER & TIMBES, P.A.

*Sarah Baum*

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Sarah D. Baum (SC Bar No. 104544)

May 20, 2024

**VIA US MAIL AND EMAIL**

The Honorable Jenny Abbott Kitchings  
Office of Court Administration  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 2911  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

**RECEIVED**  
**May 20 2024**  
**SC Court of Appeals**

**Re: 200 River Landing Drive Phase I Condominium Association, Inc., et al. v.  
Watkins Service, Inc. et al.  
Appellate Case No.: 2023-001832**

Dear Ms. Kitchings,

Enclosed please find Respondents' Request for Extension of Time to File and Serve Respondents' Initial Brief and Designation of Matter, which is currently due on May 21, 2024, and making the same now due on June 20, 2024. The filing fee is being placed in the mail. Thank you in advance for your assistance with this matter. Should you have any questions or concerns please do not hesitate to contact me.

Very truly yours,



Michael A. Timbes  
[michael@tktlawyers.com](mailto:michael@tktlawyers.com)

MAT/sdb

Enc. As stated  
CC: All counsel of record (via email only)  
Client (via email only)