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Aug 30 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 A SECOND
EXTENSION OF TIME TO FILE REPLY 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 Reply Brief and Designation of Matter.

The Appellants' motion is based on the grounds that Counsel for Appellants requires additional time to prepare the Reply Brief and Designation of Matter due to recent illness with COVID, a family member's medical event, and a very active caseload and trial schedule, and would respectfully request an additional ten (10) days to complete, file and serve these pleadings. This is the second request for an extension related to the Reply. Ross Appel, Counsel for Respondents, consented to this request.

WHEREFORE, the Appellants respectfully request, with the consent of Counsel for Respondents, that they be granted an additional ten (10) days to file their Reply Brief and Designation of Matter.

Respectfully submitted,

August 30, 2024

s/James Edward Bradley
James Edward Bradley, SC Bar #66130
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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 Rely Brief and Designation of Matter on the Respondents on August 30, 2024, via email addressed to their attorneys of record as follows:

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

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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.

August 30, 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 have filed by email this date a motion for an extension to file their Reply 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,

Lynn G. Ivey
Assistant to James Edward Bradley

Enclosure

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

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