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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2024-001403

Charles Blanchard Construction Corp. Inc.....Plaintiff

v.

480 King Street, LLC Defendant

480 King Street, LLC.....Third-Party Plaintiff, Respondent

v.

Glick/Boehm & Associates, Inc.Third-Party Defendant, Petitioner

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Respondent 480 King Street, LLC, through its undersigned counsel, respectfully requests a twenty (20) day extension of time to file its Return to the Petition for Writ of Certiorari. This is Respondent’s first request for an extension of time as to this filing. This extension is requested due to unavoidable obligations that have arisen in other matters over the course this month, including matters on appeal to this Honorable Court and the South Carolina Court of Appeals. As reflected in the attached email correspondence, Counsel for Petitioner does not object to Respondent’s Motion.

Respondent's Return is currently due on Monday, October 14, 2024. If this Motion is granted, the new deadline for the Return will be Monday, November 4, 2024. A twenty (20) day extension of time will serve the interests of justice and aid the Court by allowing counsel adequate time to prepare a thorough Return to the Petition. Respondent does not request this extension for the impermissible purpose of delay.

Respondent also respectfully requests that this Honorable Court hold all deadlines in abeyance until an order has been issued on this Motion.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/ Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)
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HALVERSEN AND HALVERSEN, LLC

s/Brent S. Halversen

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Attorneys for Respondent 480 King Street, LLC

October 9, 2024
Mount Pleasant, South Carolina

From: Smith, Hannah E. hsmith@csvg.law 
Subject: RE: Charles Blanchard v. 480 King Street, LLC 2021-001510 - Respondent's Motion for Extension
Date: October 9, 2024 at 11:18 AM
To: Jesse Sanchez jesse@jessesanchezlaw.com, Ammon, Tina M. tammon@csvg.law, Stair, Kent T. KStair@csvg.law, Teich, Jordan N. jteich@csvg.law, Sion, Emily D. esion@csvg.law
Cc: brent@halversenlaw.com

Jesse –

Confirmed – no objection on our end to your request for an extension of time.

Best,

Hannah



Hannah E. Smith
Associate Attorney

d: 843.266.8233 | f: 843.727.2995

hsmith@csvg.law | www.csvg.law

40 Calhoun Street, Suite 400, Charleston, SC 29401

From: Jesse Sanchez <jesse@jessesanchezlaw.com>
Sent: Wednesday, October 9, 2024 11:14 AM
To: Ammon, Tina M. <tammon@csvg.law>; Stair, Kent T. <KStair@csvg.law>; Teich, Jordan N. <jteich@csvg.law>; Smith, Hannah E. <hsmith@csvg.law>; Sion, Emily D. <esion@csvg.law>
Cc: brent@halversenlaw.com
Subject: Re: Charles Blanchard v. 480 King Street, LLC 2021-001510 - Respondent's Motion for Extension

Good morning,

We are approaching the deadline for submitting our Return to the Petition for Writ of Certiorari and plan on filing a Motion for a twenty day extension of time. We would like to include that Counsel for Petitioner does not object to the motion. Would you confirm the same via reply to this email? As always, please call me if you have any questions.

Thank you,

Jesse

On Tue, Aug 27, 2024 at 10:11 AM Ammon, Tina M. <tammon@csvg.law> wrote:

Good morning,

Attached for filing, please find Third-Party Defendant, Respondent Glick/Boehm & Associates, Inc.'s Motion for Extension of filing a Petition for Writ of Certiorari in the above referenced matter.

Thank you,



Tina M. Ammon

Legal Secretary

d: 843.266.8232 | f: 843.727.2995

tammon@csvg.law | www.csvl.law

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PLEASE NOTE WE HAVE A NEW ADDRESS:

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