

RECEIVED

Apr 08 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Michael G. Nettles, Circuit Judge

Appellate Case No. 2024-001724
Court of Common Pleas Case No. 2022-CP-10-05594

ASZANE CRUZ,

RESPONDENT/APPELLANT,

v.

ARETE WYNDHAM PROPERTY OWNER, LLC
D/B/A WYNDHAM PLACE APARTMENTS; CASA
BAHARI, LLC; DARLINGTON 48 UNIT, LLC;
AND JOHN DOE, INDIVIDUALLY AND AS
MANAGER/ GENERAL MANAGER OF ARETE
WYNDHAM PROPERTY OWNER, LLC D/B/A
WYNDHAM PLACE APARTMENTS,

OF WHICH CASA BAHARI, LLC IS THE APPELLANT/RESPONDENT.

**MOTION FOR EXTENSION OF TIME TO FILE AND
SERVE RECORD ON APPEAL**

NOW COMES Respondent/Appellant Aszane Cruz, (hereinafter “Respondent/Appellant”), by and through its undersigned counsel, pursuant to Rule 263(b), SCACR, and hereby moves for an extension of fifteen (15) days’ time to file/serve its record on appeal on all parties who served a brief.

Pursuant to Rule 208(a)(1), the current deadline for Respondent/Appellant’s record on appeal is April 15, 2025. Respondent/Appellant respectfully requests an extension to allow adequate time for a complete and thorough submission. This request is made in good faith and

is not intended to prejudice any party. Respondent/Appellant submits that granting this extension serves the interests of justice and will not result in any undue prejudice.

WHEREFORE, Respondent/Appellant moves this Honorable Court to grant it an extension of fifteen 15 days' time to file/serve its record on appeal on all parties who served a brief. With the extension requested herein, the new deadline for filing/serving the respondent record on appeal would be April 30, 2025, according to the undersigned's calculations. Further, Respondent/Appellant respectfully requests that the Court hold the present record on appeal deadline in abeyance until it acts upon this motion.

POULIN | WILLEY | ANASTOPOULO, LLC

s/ India D. Shaw

India D. Shaw, Esq.

S.C. Bar No.: 104339

Poulin | Willey | Anastopoulos, LLC

32 Ann Street

Charleston, SC 29403

(803) 222-2222

TeamShaw@PoulinWilley.com

Charleston, South Carolina

April 8, 2025

RECEIVED

Apr 08 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Michael G. Nettles, Circuit Judge

Appellate Case No 2024-001724
Court of Common Pleas Case No. 2023-CP-21-02320

ASZANE CRUZ,

RESPONDENT/APPELLANT,

v.

ARETE WYNDHAM PROPERTY OWNER, LLC
D/B/A WYNDHAM PLACE APARTMENTS; CASA
BAHARI, LLC; DARLINGTON 48 UNIT, LLC; AND
JOHN DOE, INDIVIDUALLY AND AS MANAGER/
GENERAL MANAGER OF ARETE WYNDHAM
PROPERTY OWNER, LLC D/B/A WYNDHAM PLACE
APARTMENTS,

OF WHICH CASA BAHARI, LLC IS THE APPELLANT/RESPONDENT,

PROOF OF SERVICE

I, the undersigned of the law office of Poulin, Willey, Anastopoulo, LLC, attorneys for Plaintiff Aszane Cruz, do hereby certify that I have caused to be served all parties and/or their attorneys of record to this appeal by copy of the ***MOTION FOR EXTENSION OF TIME TO FILE AND SERVE RECORD ON APPEAL*** which copy has been emailed and/or mailed, with sufficient postage affixed thereto, to the addresses below:

Parties Served:

James A. Bruorton, IV, Esquire (cbruorton@rosenhagood.com)

Mary Harriet Moore, Esquire (mhmoore@rosenhagood.com)

Rosen Hagood, LLC

40 Calhoun Street, Suite 450

Charleston, SC 29401

India Shaw, Esquire (india.shaw@poulinwilley.com / teamshaw@poulinwilley.com)
Chase Coble, Esquire (chase.coble@poulinwilley.com / teamcoble@poulinwilley.com)
Poulin, Willey, and Anastopoulo, LLC
32 Ann Street
Charleston, SC 29403

Darlington 48 Unit, LLC
c/o Bob Lambert, Registered Agent
22136 Oak Orchard Road
New Hall, Los Angeles County, CA 91321

Darlington 48 Unit, LLC (last known address)
307 State Road S-21-174
Florence, SC 29501

POULIN | WILLEY | ANASTOPOULO, LLC

s/ India D. Shaw
India D. Shaw, Esq.
S.C. Bar No.: 104339
Poulin | Willey | Anastopoulo, LLC
32 Ann Street
Charleston, SC 29403
(803) 222-2222
TeamShaw@PoulinWilley.com

Charleston, South Carolina
April 8, 2025