

RECEIVED

Jun 22 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2026-000077
Case No. 2015-CP-10-00955

Palmetto Pointe at Peas Island Condominium Property Owners Association,
Inc. and Elizabeth A. Bushey, individually, and on behalf of all others similarly
situated,..... Appellants,

vs.

Island Pointe, LLC; Complete Building Corporation; Tri-County Roofing,
Inc.; Creekside, Inc; American Residential Services, LLC d/b/a ARS/Rescue
Rooter Charleston; Anderson Windows, Inc; Atlantic Building Construction
Services, d/b/a Gale Contractor Services; Novus Architects, Inc., f/k/a SGM
Architects, Inc.; Tallent and Sons, Inc; W C Services, Inc.; CRG Engineering,
Inc; CertainTeed Corporation; Kelly Flooring Products, Inc, d/b/a Carpet
Baggers; Cornerstone Construction and Mark Malloy d/b/a Cornerstone
Construction; Miracle Siding, LLC and Wilson Lucas Sales d/b/a Miracle
Siding, LLC; Mark Palpoint a/k/a Micah Palpoint; Elroy Alonzo Vasquez;
Chris a/k/a John Doe 61; Alderman Construction; Stanley's Vinyl Fences
Designs; Cohen's Drywall Company, Inc; Mosley Concrete; Hand A Framing
Construction, LLC a/k/a H&A Framing Construction, LLC and d/b/a H and A
Framing, LLC, H&A Construction, and Hand A Construction; JMC
Construction, Inc; JMC Construction, LLC; John Doe 1-15,..... Defendants,

of which

Tri-County Roofing, Inc. is theRespondent.

**RESPONDENT’S MOTION FOR AN EXTENSION
OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Pursuant to Rule 240(a), SCACR, Respondent Tri-County Roofing, Inc. (“Respondent”), respectfully moves this Court for an Order granting an extension of time to file and serve its Initial Brief and Designation of Matter. Respondent’s Initial Brief and Designation of Matter are due June 22, 2026. Respondent respectfully requests a thirty (30) day extension until July 22, 2026. Respondent asserts the extension is necessary because of undersigned counsel’s schedule and caseload; for in-depth discussions with clients over the remaining issues in this matter; and to adequately prepare said Initial Brief and Designation of Matter. Accordingly, Respondent respectfully moves this Court for an extension of time until July 22, 2026, to file and serve Respondent’s Initial Brief and Designation of Matter. This is Respondent’s first request for an extension.

Respondent greatly appreciates the Court’s time, attention, and assistance with regard to this request.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By: s/Christian Stegmaier
CHRISTIAN STEGMAIER
SC Bar No. 68648
cstegmaier@collinsandlacy.com
EVAN M. GESSNER
SC Bar No. 77704
egessner@collinsandlacy.com
ROBERT S. FORNEY
SC Bar No. 101923
rforney@collinsandlacy.com
Post Office Box 12487
Columbia, SC 29211
803.256.2660 (voice)
803.771.4484 (fax)

ATTORNEYS FOR RESPONDENT
TRI-COUNTY ROOFING, INC.

**RESPONDENT'S'S MOTION FOR
AN EXTENSION OF TIME TO FILE
INITIAL BRIEF AND
DESIGNATION OF MATTER**

June 22, 2026
Columbia, South Carolina

RECEIVED

Jun 22 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Jennifer B. McCoy, Circuit Court Judge

Appellate Case No. 2026-000077
Case No. 2015-CP-10-00955

Palmetto Pointe at Peas Island Condominium Property Owners Association,
Inc. and Elizabeth A. Bushey, individually, and on behalf of all others similarly
situated,..... Appellants,

vs.

Island Pointe, LLC; Complete Building Corporation; Tri-County Roofing,
Inc.; Creekside, Inc; American Residential Services, LLC d/b/a ARS/Rescue
Rooter Charleston; Anderson Windows, Inc; Atlantic Building Construction
Services, d/b/a Gale Contractor Services; Novus Architects, Inc., f/k/a SGM
Architects, Inc.; Tallent and Sons, Inc; W C Services, Inc.; CRG Engineering,
Inc; CertainTeed Corporation; Kelly Flooring Products, Inc, d/b/a Carpet
Baggers; Cornerstone Construction and Mark Malloy d/b/a Cornerstone
Construction; Miracle Siding, LLC and Wilson Lucas Sales d/b/a Miracle
Siding, LLC; Mark Palpoint a/k/a Micah Palpoint; Elroy Alonzo Vasquez;
Chris a/k/a John Doe 61; Alderman Construction; Stanley's Vinyl Fences
Designs; Cohen's Drywall Company, Inc; Mosley Concrete; Hand A Framing
Construction, LLC a/k/a H&A Framing Construction, LLC and d/b/a H and A
Framing, LLC, H&A Construction, and Hand A Construction; JMC
Construction, Inc; JMC Construction, LLC; John Doe 1-15,..... Defendants,

of which

Tri-County Roofing, Inc. is theRespondent.

PROOF OF SERVICE

I hereby certify that I have served **RESPONDENT’S MOTION FOR AN EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER** upon all parties by electronic mail to the below listed counsel on June 22, 2026, at the following addresses:

Justin O. Lucey, Esquire
Stephanie Drawdy, Esquire
Anna S. McCann, Esquire
Sohayla R. Townes, Esquire
Justin O'Toole Lucey, P.A.
415 Mill Street
Mt. Pleasant, SC 29464
jlucey@lucey-law.com
sdrawdy@lucey-law.com
amccann@lucey-law.com
stownes@lucey-law.com

-and-

Edward D. Buckley, Jr., Esquire
Russell G. Hines, Esquire
Clement Rivers, LLP
Post Office Box 993
Charleston, SC 29402
ebuckley@ycrlaw.com
rhines@ycrlaw.com

***Counsel for Palmetto Pointe At Peas Island
Condominium Property Owners Association, Inc.
And Elizabeth A. Bushey, Individually, and on
behalf of all others similarly situated***

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

By: s/Christian Stegmaier
CHRISTIAN STEGMAIER
SC Bar No. 68648
cstegmaier@collinsandlacy.com
EVAN M. GESSNER
SC Bar No. 77704
egessner@collinsandlacy.com
ROBERT S. FORNEY
SC Bar No. 101923
rforney@collinsandlacy.com
Post Office Box 12487
Columbia, SC 29211
803.256.2660 (voice)
803.771.4484 (fax)

ATTORNEYS FOR RESPONDENT
TRI-COUNTY ROOFING, INC.

**PROOF OF SERVICE -
RESPONDENT'S MOTION FOR AN
EXTENSION OF TIME TO FILE
INITIAL BRIEF AND
DESIGNATION OF MATTER**

June 22, 2026
Columbia, South Carolina