

September 3, 2014

The Honorable Jenny Abbott Kitchings
SC Court of Appeals
Clerk of Court
P.O. Box 11629
Columbia, SC 2921

RE: McGuinn Construction Management, Inc., Appellant, v.
Saul Espino and Mara Espino, Respondents.
And
Saul Espino and Mara Espino, Respondents, v.
Gates Commons, LLC, S. Wade McGuinn, Individually, and Town
of Lexington, Defendants,
Of whom Town of Lexington is the Appellant
Appellate Case No. 2014-001519

Dear Ms. Kitchings:

I trust this letter finds you well. Our office represents the Appellant, McGuinn Construction Management, Inc., in the above referenced appeals which have been consolidated per order of the Court of Appeals. These appeals arise out of complex litigation dating back a number of years. The matter in the lower court was complicated by the unfortunate death of Judge James Johnson, Jr. who passed away after ruling on a number of issues. This appeal arises out of an Order for Reconsideration issued by the Honorable William P. Keesley addressing orders issued by Judge Johnson.

As set forth above, both my client (McGuinn Construction) and the Town of Lexington have appealed this order. After receiving correspondence from V. Claire Allen, Deputy Clerk, on July 17, 2014, I calendared the due date for my initial brief and transcript of record for 30 days from the date of Ms. Allen's letter. I subsequently obtained an extension from the Court extending my deadline to Monday, September 15, 2014.

Today, in speaking with Attorney Andrew Lindemann, I learned that there was a hearing in front of Judge Keesley prior to the issuance of his order. Attorney Lindemann has ordered a copy of the transcript and filed proof of this with the clerk's office. The transcript has not yet been delivered from the court reporter.

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Therefore, it appears that my motion for an extension of time, subsequently granted by the Court, was premature as the transcript has not yet been delivered in this case. Therefore, I would respectfully request that the due date for my initial brief and designation of matter be extended until such time as a copy of the transcript of hearing is received from the court reporter. I realize that I created this confusion by "jumping the gun" and moving for an extension of time that I did not actually need. However, as set forth above, I was not aware that a transcript existed and had been ordered until speaking with Attorney Lindemann this morning.

Thank you in advance for your assistance and consideration in this matter. If I need to provide the Court with any further information, I will be more than happy to do so.

With kindest regards, I am respectfully,

Yours very truly,



John C. Bradley, Jr.

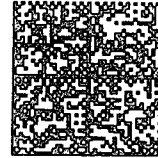
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cc: Andrew A. Aun, Esquire
John S. Nichols, Esquire
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