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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Case No. 2010-CP-10-9672

RECEIVED

SEP 15 2014

SC Court of Appeals

Hayden Jeffords, individually, and on behalf of All Others Similarly Situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs,

Of Whom Titus Gudel, Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants,

and

Of Whom John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents.

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; Salvador Rubalcaba d/b/a Rubalcaba Construction, Defendants,

Of Whom East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; and Kevin Ball are the Primary Appellants,

v.

East Bridge Lofts, LLC; Central 3, LLC; Creekstone Eastbridge, LLC; and Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC; Third-Party Plaintiffs,

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third-Party Defendants.

MOTION FOR EXTENSION OF TIME

YOUNG CLEMENT RIVERS, LLP
Edward D. Buckley, Jr.
Russell G. Hines
P.O. Box 993
Charleston, SC 29402
(843) 577-4000

-and-

JUSTIN O'TOOLE LUCEY, P.A.
Justin O'Toole Lucey
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Mount Pleasant, SC 29465
(843) 849-8400

***Attorneys for Respondents John Zohlen,
Mary Zohlen, Leslie Anne O'Neal, and
Trivette C. Hatcher***

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW the Respondents, John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher (hereinafter, the "Respondents"), by and through their undersigned counsel, pursuant to Rule 263, SCACR, and, in light of other time commitments, respectfully move this Honorable Court for a 10-day extension of the deadline for filing/serving the response to Appellant Steven Goldberg's Motion to Enforce Settlement Agreement.

With the extension requested herein, the new deadline for the response to Appellant Steven Goldberg's Motion to Enforce Settlement Agreement would be September 22, 2014, according to the undersigned's calculations. Further, the Respondent respectfully requests that the Court hold the Respondent's present deadline for response in abeyance until it acts upon this motion.

SIGNATURE ON NEXT PAGE

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: Joanna Strand for Russell
Edward D. Buckley, Jr. Hines (w/
Russell G. Hines permission)
25 Calhoun Street, Suite 400
Charleston, SC 29401
(843) 577-4000

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***Attorneys for Respondents John Zohlen,
Mary Zohlen, Leslie Anne O'Neal, and
Trivette C. Hatcher***

Charleston, South Carolina

Dated: 9/12/14

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Hayden Jeffords, individually, and on behalf of All Others Similarly Situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs,

Of Whom Titus Gudel, Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants,

and

Of Whom John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents.

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; Salvador Rubalcaba d/b/a Rubalcaba Construction, Defendants,

Of Whom East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; and Kevin Ball are the Primary Appellants,

v.

East Bridge Lofts, LLC; Central 3, LLC; Creekstone Eastbridge, LLC; and Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC; Third-Party Plaintiffs,

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third-Party Defendants.

PROOF OF SERVICE

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*Attorneys for Respondents John Zohlen,
Mary Zohlen, Leslie Anne O'Neal, and
Trivette C. Hatcher*

I, Joanna Br. Stroud, of Young Clement Rivers, LLP, do hereby certify that a copy of the **Motion for Extension of Time** was sent to all counsel via United States mail, postage pre-paid on September 12, 2014 addressed as follows:

Justin Lucey, Esquire
Joshua F. Evans, Esquire
415 Mill Street
Mount Pleasant, SC 29465

I. Keith McCarty, Esquire
McCarty Law Firm
P.O. Box 30055
Charleston, SC 29417

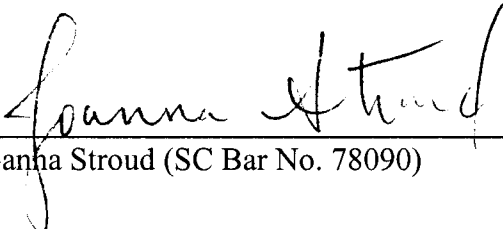
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1329 Blanding Street
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Respectfully submitted,

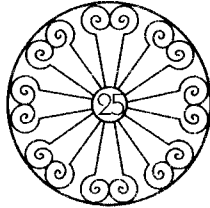
YOUNG CLEMENT RIVERS, LLP



Joanna Stroud (SC Bar No. 78090)

Charleston, South Carolina

Dated: 9/12/14



YCR LAW
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Secretary

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September 12, 2014

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

SEP 15 2014

SC Court of Appeals

Re: East Bridge Lofts Property Owners Association, Inc. vs. East Bridge Lofts, LLC;
Mike Washburn; Creekstone SC I; Creekstone Builders, Inc.; Don Henry; Everett
Jackson and Steve Keller
Case No.: 2010-CP-10-10204
YCR File: 14096-20090424

Dear Jenny:

Enclosed please find the original and seven (7) copies of a **Motion for Extension of Time** along with the original and two (2) copies of the **Proof of Service** for the same. Also enclosed is the required \$25 filing fee. Please file these documents and return a stamped copy of the motion and proof of service to our office in the enclosed self-addressed stamped envelope. Please do not hesitate to let me know if you have any questions or concerns.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Katy B. Barnes
Secretary

/kbb

cc: (all below via U.S. Mail)
Justin O'Toole Lucey, Esquire, Justin O'Toole Lucey, P.A.
Joshua F. Evans, Esquire, Justin O'Toole Lucey, P.A.
I. Keith McCarty, Esquire, McCarty Law Firm, LLC
Michael S. Seekings, Esquire, Leath Bouch & Seekings, LLP
John C. Hayes, IV, Esquire, Hayes Law Firm, LLC
Mary-Margaret S. Fitzhenry, Esquire, Hayes Law Firm, LLC
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