

(a)  
**DAVIDSON & LINDEMANN, P.A.**

ATTORNEYS AND COUNSELLORS AT LAW

William H. Davidson, II  
Andrew F. Lindemann\*  
James M. Davis, Jr.†  
Robert D. Garfield  
Michael B. Wren

1611 Devonshire Drive, Second Floor  
Post Office Box 8568  
Columbia, South Carolina 29202-8568  
Telephone: (803) 806-8222  
Facsimile: (803) 806-8855  
www.dml-law.com

Daniel C. Plyler  
Joel S. Hughes  
Justin T. Bagwell  
David A. DeMasters  
Steven R. Spreeuwers  
Todd R. Flippin

Of Counsel  
Kenneth P. Woodington

\*Also Admitted In North Carolina  
†Certified Mediator

October 6, 2014

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

OCT 06 2014

**SC Court of Appeals**

13778

RE: McGuinn Construction Management, Inc. v. Saul Espino and Mara Espino  
Civil Action Number: 2005-CP-32-2712

RE: Saul Espino and Mara Espino v. Gates Commons, LLC, S. Wade McGuinn, Individually,  
and Town of Lexington  
Appellate Case Number: 2014-001519  
Civil Action Number: 2008-CP-32-4192  
Claim Number: 690001CO3151  
Our File Number: 321.7443

Dear Ms. Kitchings:

This letter is to request a thirty day extension of time to file the Initial Brief of Respondent Town of Lexington and its Designation of Matter to be Included in the Record on Appeal in the above referenced appeal. Other obligations and deadlines will prevent me from completing this brief by the current deadline, including a brief due in Federal Court on October 6, 2014, and two briefs due in the South Carolina Court of Appeals on October 7, 2014 and October 8, 2014. In addition, no prior extension has been requested by the Town of Lexington.

By my calculations, with the requested extension the Initial Brief of Respondent and its Designation of Matter will be due on or before November 5, 2014.

I have enclosed my firm's \$25.00 check for the filing fee.

If you require a formal motion, please advise.

10-6-14  
11-5-14

The Honorable Jenny Abbott Kitchings  
October 6, 2014  
Page Two

---

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/  
Enclosure

cc: Andrew A. Aun, Esquire  
Aun & McKay, P.A.  
Post Office Box 3568  
Irmo, South Carolina 29063

John S. Nichols, Esquire  
Blake A. Hewitt, Esquire  
Bluestein Nichols Thompson  
& Delgado, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202

S. Jahue Moore, Esquire  
Moore Taylor Law Firm, P.A.  
Post Office Box 5709  
West Columbia, South Carolina 29171