

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM LEXINGTON COUNTY
In the Court of Common Pleas

William P. Keesley, Presiding Judge

Appellate Case No. 2014-001519

RECEIVED

FEB 19 2015

SC Court of Appeals

175093

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.....Appellant.

MOTION FOR EXTENSION OF TIME

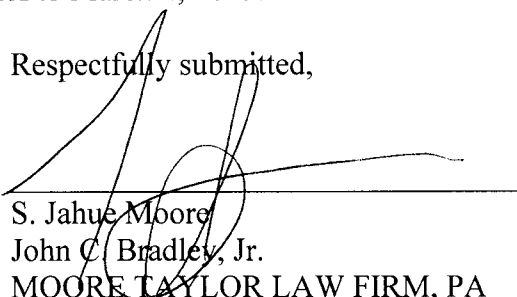
The undersigned, as counsel for Appellant McGuinn Construction Management, Inc., hereby moves for a Ten (10) day extension of time to file its Initial Reply Brief. This Motion is made on the grounds that Respondents' Initial Brief and Designation of Matter were filed out of time on February 9, 2015. Notification that the Court accepted this filing out of time was received on February 13, 2015. However, no instruction was given as to the due date for the Initial Reply Brief. Based on these factors, as well as

Appellant's counsel's unusually heavy work load including a matter before the South Carolina Supreme Court on February 19, 2015, the undersigned respectfully requests an extension. This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would extend Appellant's deadline for filing the Initial Reply Brief to March 2, 2015. Appellant will not request any additional time to prepare and file its Reply Brief beyond that date.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Initial Reply Brief to March 2, 2015.

Respectfully submitted,

By:



S. Jahue Moore
John C. Bradley, Jr.
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803-791-8410 (Fax)
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Attorneys for Appellant McGuinn
Construction Management, Inc.

West Columbia, SC
February 19, 2015

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PROOF OF SERVICE

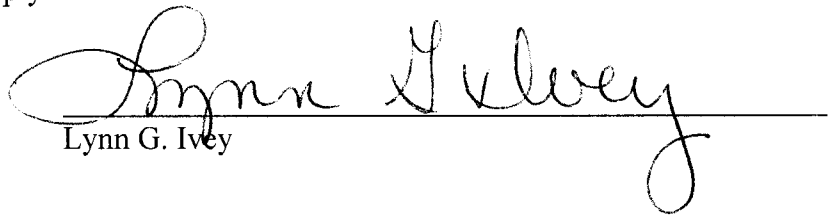
I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below Motion for Extension of Time to File Appellant's Initial Reply Brief upon counsel of record, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, addressed as listed below.

Andrew F. Lindemann
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P.O. Box 8568
Columbia, SC 29202-8568

Andrew A. Aun
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John S. Nichols, Esquire
Blake Hewitt, Esquire
Bluestein Nichols Thompson & Delgado
PO Box 7965
Columbia, SC 29202

DOCUMENT(S): 1. Motion for Extension of Time to File Appellant's Initial
Reply Brief



Lynn G. Ivey

West Columbia, South Carolina
February 19, 2015



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FEB 19 2015

SC Court of Appeals

February 19, 2015

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

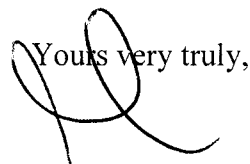
RE: McGuinn Construction Management, Inc. v. Saul Espino and Mara
Espino
Case No. 2014-001519

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven copies of a Motion for Extension in regards to this case. I have also enclosed a proof of service of this document on counsel for respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you in advance for your assistance in this matter.

With kindest regards I am,

Yours very truly,


John C. Bradley, Jr.

/lgi

Enclosures

cc w/encl.: Andrew A. Aun, Esquire (Counsel for Plaintiffs/Defendants Espino)
Bradford T. Cunningham, Esquire (Counsel for Defendant Town of Lexington)
Andrew F. Lindemann, Esquire (Counsel for Gates Commons, LLC)