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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
J.C. Nicholson, Jr., Circuit Court Judge

**RECEIVED**

FEB 23 2015

**SC Court of Appeals**

Case No. 2012-CP-10-7594

Case Tracking No. 2014-002115

One Belle Hall Property Owners Association, Inc. and Brandy Ramey, individually, and on behalf of all others similarly situated,

Respondents,

v.

Trammell Crow Residential Company; TCR NC Construction I, LP; Belle Hall Direct 101, LP; TCR RLD Condominiums, Inc.; CS 101 Belle Hall, LP; TCR Southeast, Inc.; TCR Carolina Properties, Inc.; TCR SE Construction, Inc.; TCR SE Construction II, Inc.; TCR Construction, a division of Trammell Crow Residential; TCR Development, a division of Trammell Crow Residential; Trammell Crow Residential Carolina, a division of Trammell Crow Residential; and Tauer Consulting Company, Inc. a division of Trammell Crow Residential, each individually, and collectively d/b/a "Trammell Crow Residential," "Trammell Crow" or "TCR"; Halter Properties, LLC; Halter Realty, LLC; and Halter Realty Group, LLC, each individually, and collectively d/b/a "Halter Companies", Jane Doe 1-5; ABG Caulking & Waterproofing of Morristown, Inc. a/k/a ABG Caulking Contractors; Advanced Building Products & Services, LLC; BASF Corporation, Budget Mechanical Plumbing, Inc.; Builders First Source – Southeast Group, LLC; Builders Services Group, Inc., individually, and d/b/a/ Gale Contractor Services, Inc.; Century Fire Protection, LLC; Cline Design Associates, P.A. and Gary D. Cline; Coastal Lumber and Framing, LLC; Dodson Brothers Exterminating Co., Inc. a/k/a Dodson Pest Control; First Exteriors, LLC; Flooring Services, Inc.; General Heating & Air Conditioning Company of Greenville, Inc. d/b/a General Heating and Air; Jimmy Warner, individually, and d/b/a Warner Heating & Air; Glazing Consultants, Inc.; GWC Roofing, Inc., individually, and d/b/a Southcoast Exteriors, Inc.; Houston Stafford Electrical Contractors, LP a/k/a IES Residential, Inc. d/b/a Houston Stafford Electric; KMAC of the Carolinas, Inc.; P&P Metal Sales, Co., Inc. a/k/a P&P Metal Sales, LLC a/k/a P&P Metal Sales, Inc. a/k/a Carolina Metals; Pleasant Places, Inc.; Raymond Building Supply Corporation d/b/a Energy Saving Products of Florida, Inc. a/k/a Energy Saving Products of Florida, RS Custom Homes, LLC; Southern Specialties, Inc.;

Structural Contractors South, Inc.; Superior Construction Services, Inc., individually, and d/b/a Superior Masonry Unlimited, Inc.; TAMKO Building Products, Inc. f/k/a TAMKO Roofing Products, Inc.; VNS Corporation, individually, and d/b/a Wholesale Building Products f/k/a Wholesale Building Materials, Inc.; What Don't We Do; and John Doe 1-25, Defendants,

Of whom TAMKO Building Products, Inc., is the Appellant.

v.

VNS Corporation, individually, and d/b/a Wholesale Building Products f/k/a Wholesale Building Materials, Third Party Plaintiff,

v.

Billy Gray, d/b/a United Builders, LLC, Third Party Defendant,

and

Houston Stafford Electrical Contractors, LP a/k/a IES Residential, Inc. d/b/a Houston Stafford Electric, Third Party Plaintiff,

v.

J. Correa Electrical Company, LLC, Third-Party Defendant.

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**RESPONDENTS' MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, Respondents request an extension of the deadline for filing and serving their Initial Brief and Designation of Matters to Include in the Record on Appeal. The current deadline is March 4, 2015. We request the Court extend the date for an additional thirty days, setting the Respondents' deadline to file their Initial brief and Designation of Matters on April 4, 2015. This is Respondents' first extension request.

[SIGNATURE LINE TO FOLLOW]

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**SC Court of Appeals**

JUSTIN O'TOOLE LUCEY, P.A.

By: Dabny Lynn

Dabny Lynn

Justin O'Toole Lucey

415 Mill Street

Mount Pleasant, SC 29464

Telephone: (843) 849-8400

Fax: (843) 849-8409

*Attorneys for Respondent.*

Mount Pleasant, SC

February 19, 2015

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Structural Contractors South, Inc.; Superior Construction Services, Inc., individually, and d/b/a Superior Masonry Unlimited, Inc.; TAMKO Building Products, Inc. f/k/a TAMKO Roofing Products, Inc.; VNS Corporation, individually, and d/b/a Wholesale Building Products f/k/a Wholesale Building Materials, Inc.; What Don't We Do; and John Doe 1-25, Defendants,

Of whom TAMKO Building Products, Inc., is the Appellant.

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and

Houston Stafford Electrical Contractors, LP a/k/a IES Residential, Inc. d/b/a Houston Stafford Electric, Third Party Plaintiff,

v.

J. Correa Electrical Company, LLC, Third-Party Defendant.

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**PROOF OF SERVICE**

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I certify that I have served the Respondents' Motion for Extension on TAMKO Building Products, Inc., by depositing a copy of it in the United States Mail, postage prepaid, on February 19, 2015, addressed to their attorneys of record, Richard H. Willis, Angela G. Strickland and Paula M. Burlison at 1441 Main Street, Suite 1200, Columbia, SC 29201.

[SIGNATURE PAGE TO FOLLOW]

JUSTIN O'TOOLE LUCEY, P.A.

By: Dabny Lynn

Dabny Lynn

415 Mill Street

Mount Pleasant, SC 29464

Telephone: (843) 849-8400

Fax: (843) 849-8406

*Attorney for Respondents.*

Mount Pleasant, SC

February 19, 2015

# JUSTIN O'TOOLE LUCEY, PA

*Attorney at Law*

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Phone: 843.849.8400 · Fax: 843.849.8406 · office@lucey-law.com

*Reply to:*  
P.O. Box 806  
Mount Pleasant, SC 29465

February 19, 2015

**VIA U.S. MAIL**

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

RE: One Belle Hall Property Owners Association, Inc. and Brandy Ramey, individually, and on behalf of all others similarly situated vs. Trammel Crow Residential Co., et al.  
Case No.: 2012-CP-10-7594;  
Appellate Case No.: 2014-002115

Dear Ms. Kitchings,

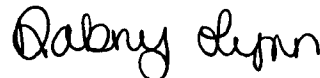
Please find enclosed for filing the original and seven (7) copies of the *Respondents' Motion for Extension to File Initial Brief*. I have enclosed a proof of service of this document on Counsel for the Appellant and a check in the amount of \$25.00 for filing this motion. Please return the additional clocked copies to me via the self-addressed stamped envelope.

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**SC Court of Appeals**

Sincerely,



Dabny Lynn

Justin O'Toole Lucey, P.A.

DL/Imm

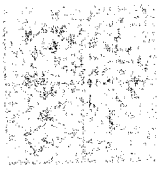
Enclosures (as stated)

cc: Richard H. Willis, Angela G. Strickland and Paula M. Burlison, Attorneys for Appellant  
(via e-mail and U.S. mail w/ enclosures)

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Y, PA

SC 29465-0806

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

