

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM YORK COUNTY
In the Court of Common Pleas
Sixteenth Judicial Circuit

S. Jackson Kimball, Special Circuit Court Judge

Appellate Case No. 2015-000293

The Greens of Rock Hill, LLC and GRH 2011, LLC, Petitioners.

v.

Rizon Commercial Contracting, Inc., Road Machinery and Supplies Co., Defendants,
of whom Rizon Commercial Contracting, Inc. is the Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S RETURN TO
PETITION FOR WRIT OF CERTIORARI

The Respondent respectfully requests a 20 day extension of time to file a Return to Petition for Writ of Certiorari. The reason for the need for the extension of time is due to being out of the office for an extended time for back surgery and recovery. The undersigned had a fusion of seven vertebrae and has not been able to return to work full time as soon as anticipated. For the above reason, the undersigned requests this extension.

Respectfully submitted.

Other counsel of record:

Herb Hamilton
Keith Martens
Hamilton, Martens & Ballou, LLC
Rock Hill, SC 29731



Daniel D. D'Agostino
D'Agostino Law Firm
25 W. Liberty St.
York, South Carolina 29745
(803) 628-6509
Attorney for Respondent

RECEIVED

MAR 23 2015

S.C. Supreme Court

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM YORK COUNTY
In the Court of Common Pleas
Sixteenth Judicial Circuit

S. Jackson Kimball, Special Circuit Court Judge

Docket No. 2012-CP-46-1815
Appellate Case No. 2015-000293

RECEIVED

MAR 23 2015

S.C. Supreme Court

The Greens of Rock Hill, LLC and GRH 2011, LLC, Petitioners.

v.

Rizon Commercial Contracting, Inc., Road Machinery and Supplies Co., Defendants,

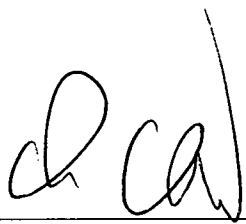
of whom Rizon Commercial Contracting, Inc. is the Respondent.

PROOF OF SERVICE

I certify that I served the Motion for Extension of Time to File Respondent's Return to Petition for Writ of Certiorari on the respondent by depositing a copy of it in the United States mail, correctly addressed, postage prepaid, on March 13, 2015, addressed to

Herb Hamilton
Keith Martens
Hamilton, Martens & Ballou, LLC
PO Box 10940
Rock Hill, SC 29731

March 13, 2015



Daniel D. D'Agostino
D'Agostino Law Firm
25 W. Liberty St.
York, South Carolina 29745
(803) 628-6509
Attorney for Respondent



D'AGOSTINO
LAW FIRM

Daniel D. D'Agostino | Jacqueline N. Davis

25 West Liberty Street
York, South Carolina 29745

Phone 803.628.6509 | Fax 803.628.7990

www.dagostinolawyers.com

March 13, 2015

Daniel Shearouse, Clerk
The Supreme Court of S.C.
P.O. Box 11330
Columbia, SC 29211

RE: The Greens of Rock Hill, LLC; GRH 2011, LLC, Petitioners v. Rizon Commercial Contracting, Inc., Road Machinery and Supplies Co., Defendants, of whom Rizon Commercial Contracting, Inc. is the Respondent.
C.A. No.: 2012-CP-46-1815
Appellate Case No.: 2015-000293

Dear Mr. Shearouse:

I have enclosed a Motion for Extension of Time along with a Proof of Service in reference to the above case.

With kind regards, I am

Sincerely yours,

Daniel D. D'Agostino
25 W. Liberty St.
York, SC 29745
803-628-6509

Attorney for Respondent

RECEIVED

MAR 23 2015

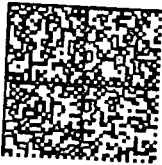
S.C. Supreme Court


cc: Herbert Hamilton
Keith Martens
P.O. Box 10940
Rock Hill, SC 29731

D'Agostino
25 W. Liberty St.
York, SC 29745

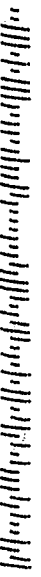
6509 0921311252

Daniel Shearouse, Clerk
The Supreme Court of S.C.
P.O. Box 11330
Columbia, SC 29211



UNITED STATES POSTAGE
 PITNEY BOWES
02 1P \$000.690
0001767102 MAR 13 2015
MAILED FROM ZIP CODE 29745

29211 31330 B099





The Supreme Court of South Carolina

D'Agostino Law Firm

03/23/2015

RECEIPT #75421

Case No: 2015-000293
Case Short Title: The Greens of Rock Hill v. Rizon Commercial
Event:
Fee Type: Motion Fee
Amount: \$25.00
Payment Type: Check
Reference No: 015398
Check/Money Order Date: 03/13/2015
Comments: