

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2014-002766

Circuit Case No. 2012-CP-10-3857

Shipwatch Condominium Association, Inc., ..... Appellant,

v.

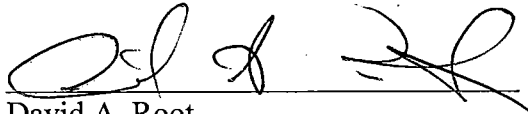
Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy, individually;  
Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.; Spectec, Inc.; Sonneborn, Inc.;  
Chimney Sweeps, Inc.; Low Country Chimneys, Inc.; EFCO Corp.; W.C. Johnston Architectural  
Sales, Inc.; Charleston Glass Company, Inc.; First Exteriors, LLC; Acrocrete, Inc.; BASF Corp.;  
Gary Freeman Architect, Inc.; Gary Freeman, individually, ..... Defendants,

Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy,  
individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.;  
Sonneborn, Inc.; EFCO Corp.; W.C. Johnston Architectural Sales, Inc.; Charleston Glass  
Company, Inc.; First Exteriors, LLC; Acrocrete, Inc.; BASF Corp.; Gary Freeman Architect, Inc.;  
Gary Freeman, individually, are ..... Respondents.

RESPONDENT BASF CORP.'S  
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Respondent BASF Corp. ("BASF") respectfully requests an extension of thirty (30) days  
to file its Initial Brief in this matter. Appellant's Initial Brief was filed March 2, 2015, making  
BASF's Initial Brief due April 1, 2015. BASF is requesting that that date be extended to May 1,

2015. BASF requests this additional time in order accommodate counsel's schedule and ensure it properly researches and prepares its Initial Brief. Counsel for Appellant has consented to this request.



David A. Root  
KERNODLE ROOT + COLEMAN  
914 Folly Road, Suite 2 (29412)  
P. O. Box 13897  
Charleston, SC 29422  
(843) 795-7800  
Attorneys for Respondent BASF Corp.

Charleston, South Carolina

March 30, 2015

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

RECEIVED

APR 01 2015

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

SC Court of Appeals

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2014-002766

Circuit Case No. 2012-CP-10-3857

Shipwatch Condominium Association, Inc., ..... Appellant,

v.

Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy,  
individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.; Spectec, Inc.;  
Sonneborn, Inc.; Chimney Sweeps, Inc.; Low Country Chimneys, Inc.; EFCO Corp.;  
W.C. Johnston Architectural Sales, Inc.; Charleston Glass Company, Inc.; First Exteriors,  
LLC; Acrocrete, Inc.; BASF Corp.; Gary Freeman Architect, Inc.; Gary Freeman,  
individually, ..... Defendants,

Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G.  
Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.;  
Sonneborn, Inc.; EFCO Corp.; W.C. Johnston Architectural Sales, Inc.; Charleston Glass  
Company, Inc.; First Exteriors, LLC; Acrocrete, Inc.; BASF Corp.; Gary Freeman  
Architect, Inc.; Gary Freeman, individually, are ..... Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 30, 2015 it served a copy of the  
foregoing **Motion for Extension of Time to File Initial Brief of Respondents** by  
depositing the same in the U.S. Mail, First Class postage prepaid, and addressed to the  
following:

R. Patrick Flynn, Esquire  
Robertson Hollingsworth & Flynn  
177 Meeting Street, Suite 300  
Charleston, SC 29401

Erin D. Dean, Esquire  
Stacey P. Canaday, Esquire  
Tupper, Grimsley & Dean, P.A.  
P.O. Box 2055  
Beaufort, SC 29901-2055

R. Britton Kelly Esquire  
Rosen, Rosen & Hagood, LLC  
151 Meeting St., Suite 400  
Charleston SC 29401

Paul Sperry, Esquire  
Tyler P. Winton, Esquire  
Carlock, Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401

James H. Elliott, Jr., Esquire  
Richardson Plowden & Robinson, P.A.  
40 Calhoun Street, Suite 220  
Charleston, SC 29401

J.J. Anderson, Esquire  
Danielle Wegener, Esquire  
Anderson, Reynolds & Stephens, LLC  
37 ½ Broad Street  
Charleston, SC 29401

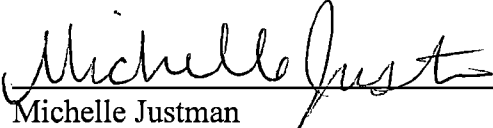
David S. Cobb, Esquire  
Turner Padget Graham & Laney, PA  
P.O. Box 22129  
Charleston, SC 29401

K. Michael Barfield, Esquire  
Barnwell Whaley Patterson & Helms  
P.O. Drawer H  
Charleston, SC 29402

Samia Nettles, Esquire  
Richardson Plowden & Robinson, P.A.  
40 Calhoun Street, Suite 220  
Charleston, SC 29401

Amanda R. Maybank, Esquire  
Marshall A. Earhart, Esquire  
Maybank Law Firm, LLC  
P.O. Box 12579  
Charleston, SC 29422

L. Gregory Horton, Esquire  
Adriane M. Belton, Esquire  
Womble Carlyle Sandridge & Rice, PLLC  
P. O. Box 999  
Charleston, SC 29402

  
Michelle Justman

914 Folly Road, Suite 2  
P.O. Box 13897  
Charleston, SC 29422-3897  
Phone (843) 795-7800  
Fax (843) 795-3032

**KERNODLE  
ROOT   
COLEMAN**  
ATTORNEYS AT LAW

**RECEIVED**

APR 01 2015

*David A. Root, Esquire*  
SC Court of Appeals [www.kernodlelaw.com](http://www.kernodlelaw.com)

March 30, 2015

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

RE: *Shipwatch Condominium Association, Inc. v. Carolina Concrete Systems, Inc.;  
Sisnroy Engineering, LLC; Robert G. Sisnroy, individually; Terrence J. McKelvey;  
Glasgow Roofing, Inc.; GlassTec, Inc.; Spectech, Inc.; Sonneborn, Inc.; Chimney  
Sweeps, Inc.; Low Country Chimneys, Inc.; EFCO Corp.; W.C. Johnston Architectural  
Sales, Inc.; Charleston Glass Company, Inc.; First Exteriors, LLC; Acrocrete Inc.;  
BASF Corp.; Gary Freeman Architect, Inc.; Gary Freeman, individually*  
Appellate Case No.: 2014-002766  
Our File No. 8092-1

Dear Ms. Kitchings:

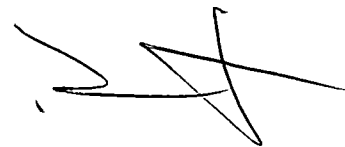
In regards to Appellate Case No. 2014-002766, enclosed for filing please find an original and seven (7) copies of a *Motion for Extension of Time to File Initial Brief*. Also enclosed is our firm check in the amount of \$25.00 in payment of the required motion fee.

Upon filing, please return one (1) clocked copy of the Motion to me in the enclosed, self-addressed, stamped envelope provided for your convenience.

Thank you for your consideration in this matter, and with kindest regards, I remain

Very truly yours,

  
David A. Root



DAR/mlj

Enclosures: *As stated herein.*

kernodlelaw.com

SC Court of Appeals  
March 30, 2015  
Page 2

cc: **Via U.S. Mail and E-Mail**

R. Patrick Flynn, Esquire

Erin D. Dean, Esquire / Stacey P. Canaday, Esquire

R. Britton Kelly Esquire

Paul Sperry, Esquire / Tyler P. Winton, Esquire

James H. Elliott, Jr., Esquire

J.J. Anderson, Esquire / Danielle Wegener, Esquire

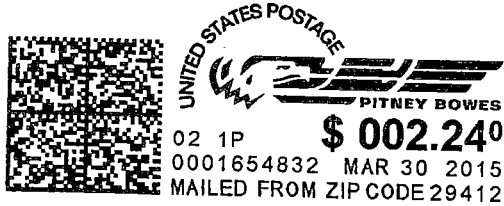
David S. Cobb, Esquire

K. Michael Barfield, Esquire

Samia Nettles, Esquire

Amanda R. Maybank, Esquire / Marshall A. Earhart, Esquire

L. Gregory Horton, Esquire / Adriane M. Belton, Esquire



**RECEIVED**

APR 01 2015

*SC Court of Appeals*

8092-1  
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211