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THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY  
COURT OF COMMON PLEAS

Clifton Newman, Circuit Court Judge

Trial Court Case No. 2010CP26-3901

RECEIVED  
JUL 29 2015  
SC Court of Appeals

Appellant Case No.: 2015-000248

Rivergate Homeowners' Association,

Appellant

v.

WW&LB Development Company, LLC,  
RWG, Inc., Aiello Associates,  
Daniels Engineering, Inc.,  
Rivergate Homeowners' Association,  
Rivergate Homeowners' Association  
Board of Directors,  
Wayne Winderman, individually,  
Salvatrice Foran, individually,  
Gerald Foran, individually,  
Marcos Soares Construction,  
William C. DeSouza, individually,  
James Eason individually and d/b/a  
James Eason & Company,  
D&D Cleaning and Construction, Inc.,  
Joel's Framing, Joe Freza,  
Aroldo Garcia, Joaquin  
Geraldo Zeferino, individually  
and d/b/a Zeferino Framing,  
Leo Trombley, Judy Schultz,  
J&D Interior Design, Jose Dasmerces  
d/b/a J.P. Construction,  
Scott Chandler d/b/a Coastal  
Custom Windows & Doors,  
R&D Construction, Nicasio  
Ramirez Zunigo, Walchir Morais,  
Marco Trebbi, Blankenship  
Roofing, Inc., DLJ Construction, LLC,  
Dewayne Bates, The Bates Group, LLC,

Bridges Construction Co., Brewer  
Construction, Inc., Speedy Concrete,  
REB-FEL, Inc., Mark Mychajluk, Eric  
Jazwinski, Southern Framing Corporation,  
AB Consulting Engineers, Inc., WWI  
Development Company, LLC,  
Michael Dawson Construction, Inc.,  
Asphalt Paving & Maintenance Co.,  
Inc. and Chuck's Construction Co.,  
Inc., Right Way Group, Inc., Stevens  
Construction Co., Inc., Geometrics,  
Inc., Eric Yazwinski, Law  
Engineering, Inc., D & M Builders,  
Inc., Hill Construction Company,  
L.L.P., Adrian Mondragon, individually  
and d/b/a Mondragon Construction, Inc.,  
and Glen Causey, Defendants,

Of Whom Speedee Concrete, Inc. and Chuck's  
Construction, Inc. are the Respondents,

Chuck's Construction Co., Inc., Third-Party Plaintiff,

v.

Vereen Concrete Co., Inc. and  
Asphalt Pavement Maintenance  
of Myrtle Beach, Inc., Third-Party Defendants,

Rivergate Homeowners' Association, Appellant,

v.

WW & LB Development Company,  
LLC, Speedy Concrete,  
AB Consulting Engineers, Inc.,  
and Chuck's Construction Co., Inc., Defendants,

Of Whom AB Consulting Engineers,  
LLC, Inc. is the Respondent.

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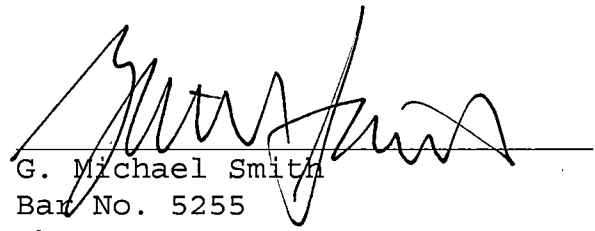
MOTION FOR EXTENSION OF TIME TO FILE  
INITIAL BRIEF OF RESPONDENT SPEEDY CONCRETE

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Pursuant to Rule 240(a), SCACR, the undersigned attorney, Counsel for Respondent Speedy Concrete, files this motion respectfully requesting the Court of Appeals for an extension of the deadline for serving and filing the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Counsel for Respondent received the Initial Brief of Appellant on July 6, 2015. Thus, the deadline for filing Respondent's Initial Brief is August 5, 2015. The undersigned had court protection from June 26, 2015 through July 13, 2015 for a family vacation and would respectfully request a 30 day extension of time to file Defendant Speedee Concrete's Initial Brief and Designation of Matter.

Dated: July 27, 2015

  
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Thompson & Henry, PA  
PO Box 1740  
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Telephone: (843)248-5741  
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Speedy Concrete

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**Attorneys for Appellant**

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Post Office Box 1349  
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**Attorney for Chuck's Construction, Inc. (Co-counsel)**

J. Christopher Clark, Esquire  
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Post Office Box 1349  
Myrtle Beach, SC 29578  
**Attorney for Chuck's Construction, Inc. (Co-counsel)**

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Clifton Newman, Circuit Court Judge **JUL 29 2015**

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Appellant Case No.: 2015-000248

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Aroldo Garcia, Joaquin  
Geraldo Zeferino, individually  
and d/b/a Zeferino Framing,  
Leo Trombley, Judy Schultz,  
J&D Interior Design, Jose Dasmerces  
d/b/a J.P. Construction,  
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Roofing, Inc., DLJ Construction, LLC,  
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Of Whom Speedee Concrete, Inc. and Chuck's  
Construction, Inc. are the Respondents,

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v.

Vereen Concrete Co., Inc. and  
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WW & LB Development Company,  
LLC, Speedy Concrete,  
AB Consulting Engineers, Inc.,  
and Chuck's Construction Co., Inc., Defendants,

Of Whom AB Consulting Engineers,  
LLC, Inc. is the Respondent.

Appellate Case No. 2015-000248

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PROOF OF SERVICE

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I certify that I have served the Motion for Extension of Time to File Initial Brief of Respondent Speedy Concrete on the following Appellant and Respondents AB Consulting Engineers, Inc. and Chuck's Construction Co., Inc. by depositing a copy of it in the United States Mail, postage prepaid, on July 28, 2015, addressed to their attorneys of record as follows:

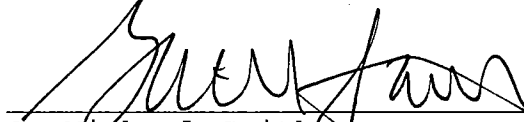
Stacy L. Stanley, Esquire  
V. Denise Hamilton, Esquire  
Stanley Law Firm  
3303 Highway 9 East  
Little River, SC 29466  
Attorneys for Appellant

Stephanie Burton, Esquire  
Gibbes Burton, LLC  
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Spartanburg, SC 29302  
Attorney for AB Consulting Engineers, Inc.

Christina Bisset, Esquire  
McAngus Goudelock & Courie, LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
Attorney for Chuck's Construction, Inc. (Co-Counsel)

J. Christopher Clark, Esquire  
McAngus, Goudelock & Courie, LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
Attorney for Chuck's Construction, Inc. (Co-Counsel)

Dated: 7/28/15

  
\_\_\_\_\_  
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Phone: (843)248-5741  
Fax: (843)248-5112  
Attorney for Speedee Concrete

# THOMPSON & HENRY, P.A.

ATTORNEYS AT LAW

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POST OFFICE BOX 1740

CONWAY, SOUTH CAROLINA 29528

July 27, 2015

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JUL 29 2015

SC Court of Appeals

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

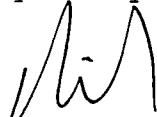
RE: Rivergate Homeowners' Association vs. WW&LB Development  
Company, LLC et al (Speedee Concrete)  
Appellate Case No.: 2015-000248  
Our Client: Speedee Concrete  
Case No: 2010-CP-26-3901  
Claim No.: 20987357/22 SBA BB9376  
Our File No: 14260.50

Dear Ms. Kitchings:

I am enclosing an original and seven copies each of Respondent Speedee Concrete's Motion for Extension of Time to File Respondent's Brief in the above-referenced matter and Proof of Service on the Appellant and Co-Respondents along with the filing fee. Please file the Motion and Proof of Service and return the clocked additional copies to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving the same upon opposing counsel. Thank you for your cooperation. If you have any questions or need anything further from me, please do not hesitate to call.

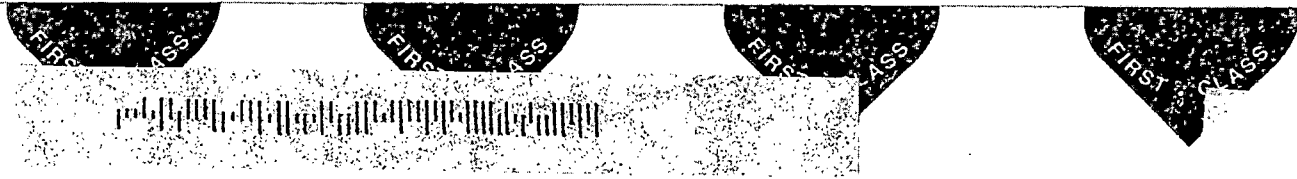
Very truly yours,


  
G. Michael Smith

GMS/tlt

Enclosures

cc: Stacy Stanley, Esq.  
Stephanie Burton, Esq.  
Christina Bisset, Esq.  
J. Christopher Clark, Esq.  
David Green  
Seth Noiseaux




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JUL 29 2015

SC Court of Appeals

<p><b>THOMPSON &amp; HENRY, P.A.</b>          POST OFFICE Box 1740          CONWAY, SC 29528</p>
<p>To:</p> <p style="margin-left: 40px;">             The Honorable Jenny Abbott              Kitchings              Clerk, SC Court of Appeals              Post Office Box 11629              Columbia, South Carolina 29211           </p>

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