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I IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

NOV 30 2015

SC Court of Appeals

R. Markley Dennis, Circuit Judge

Appellate Case No. 2015-001644

Circuit Court Case Nos. 2012-CP-10-3857 and 2012-CP-10-3858

Shipwatch Condominium Association, Inc.,Appellant,

v.

Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; Glasgow, 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;Defendants,

Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; Glasgow, 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.; and Gary Freeman, individually; areRespondents.

Oscar Mendiondo, individually and as representative of a class of similarly situated owners of condominium units in the horizontal property regime known as Shipwatch Condominiums, Appellants,

v.

Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; Glasgow, 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.; Glasgow, 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.; and Gary Freeman, individually; are Respondents.

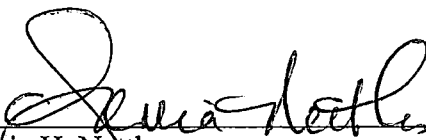
Motion for Extension of Time to Serve and File Reply to Appellant's Return of Glasgow's Motion to Dismiss a Party or in the Alternative Not to Deem Movant's Failure to Comply with Rule 240 SCACR an Abandonment of its Motion

Respondent, Glasgow Roofing, Inc. ("Glasgow") respectfully moves this Court for an Order pursuant to Rule 263(b) SCACR to file and serve its Reply to Appellant's Return of Glasgow's Motion to Dismiss a Party out of time. Counsel for Glasgow Roofing, Inc. seeks additional time due to Counsel's administrative oversight cause by receipt of the Appellant's Return while Counsel was out of town. This motion is not made for the purpose of undue delay, and is the first request for an extension of time. Counsel for Appellants has consented to the motion for an extension of time.

In the alternative, pursuant to Rule 240(g) SCACR, Glasgow requests that this Court not deem its failure to comply with the time requirement of Rule 240(f) SCACR, an abandonment of this Motion. Such a determination is discretionary, as the rule uses the word 'may', and Glasgow had no intention of abandoning its motion as is evidenced by this motion.

[Signature page to immediately follow]

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ATTORNEYS FOR GLASGOW ROOFING
COMPANY, INC.

November 23, 2015
Charleston, South Carolina

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Circuit Judge

Appellate Case No. 2015-001644

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Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC; Robert G. Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; Glasgow, 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.; and Gary Freeman, individually; areRespondents.

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v.

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I certify that I have served Respondent Glasgow Roofing, Inc.'s Motion for Extension of Time by depositing a copy in the U.S. Mail, postage paid on November 23, 2015 addressed to Appellant's attorney and to all other parties by email as agreed as set forth below:

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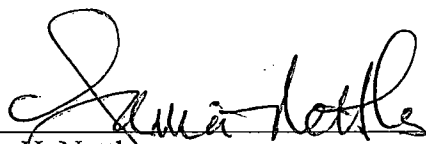
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ATTORNEYS FOR GLASGOW ROOFING
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November 23, 2015
Charleston, South Carolina

Reply to: Charleston
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SC Court of Appeals

Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
PO Box 11629
Columbia, South Carolina 29211

Re: *Shipwatch Condominium Association, Inc. vs. Carolina Concrete Systems, et al -
and Oscar Mendiondo, et al. vs. Carolina Concrete Systems, et al*
Appellate Case No. 2015-001644
Circuit Case Nos. 2012-CP-10-3858 -and- 2012-CP-10-3857

Dear Madam Clerk:

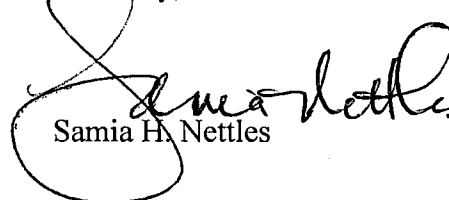
Please find enclosed an original and seven copies each of the following on behalf of Glasgow Roofing, Inc.:

1. Reply to Appellant's Return of Motion to Dismiss Appeal, Motion to Strike and Memorandum in Support, and,
2. Motion for Extension of Time to Serve and File Reply

Please file the original documents and return a clocked copy to me in the self-addressed, stamped envelope which is provided herein along with a check in the amount of \$25.00 for the Motion filing fee.

Thank you for your kind assistance in this matter.

Sincerely,

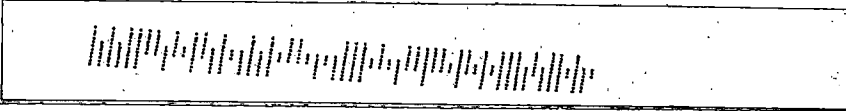

Samia H. Nettles

SHN/dw
Enclosures

cc: Counsel of Record (w/ enclosures)



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