

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Alexander S. Macaulay, Circuit Court Judge

Case No. 2009-CP-37-00652

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DEC 02 2015

SC Court of Appeals

Stoneledge at Lake Keowee Owners' Association, Inc., C. Dan Carson, Jeffrey J. Dauler, Joan W. Davenport, Michael Furnari, Donna Furnari, Jessy B. Grasso, Nancy E. Grasso, Robert P. Hayes, Lucy H. Hayes, Ty Hix, Jennifer D. Hix, Paul W. Hund, III, Ruth E. Isaac, Michael D. Plourde, Mary Lou Plourde, Carol C. Pope, Steven B. Taylor, Bette J. Taylor, and Robert White, Individually and on Behalf of All others similarly situated, Plaintiffs,

Of Whom Stoneledge at Lake Keowee Owners' Association, Inc. is the, Respondent,

v.

IMK Development Co., LLC; Keowee Townhouses, LLC; Ludwig Corporation, LLC; SDI Funding, LLC; Medallion at Keowee, LLC; Integrys Keowee Development, LLC; Marick Home Builders, LLC; Bostic Brothers Construction, Inc.; Miller/Player & Associates; Bradford D. Seckinger; John Ludwig; William C. Cox; Larry D. Lollis; Rick Thoennes; M. Group Construction and Development, LLC; Mel Morris; Joe Bostic; Jeff Bostic; Clear View Construction, LLC; Michael Franz, MHC Contractors; Miguel Porras Choncoas; Builders First Source-Southeast Group; Mike Green; Southern Concrete Specialties; Carl Compton d/b/a Compton Enterprize a/k/a Compton Enterprises; Gunter Heating & Air; All Pro Heating; A/C & Refrigeration, LLC; Coleman Waterproofing; Heyward Electrical Services, Inc.; Tinsley Electrical, LLC; Hutch N Son Construction, Inc.; Upstate Utilities, Inc.; Southern Basements; Carl Catoe Construction, Inc.; T.G. Construction, LLC; Delfino Construction; Francisco Javier Zarate d/b/a Zarate Construction; Alejandro Avalos Cruz; Herberto Acros Hernandez; Martin Hernandez-Aviles; Francisco Villalobos Lopez; Ambrosio Martinez-Ramirez; Ester Moran Mentado; Socorro Castillo Montel; MJG Construction and Homebuilders, Inc. d/b/a MJG Construction; KMAC of the Carolinas, Inc.; Eufacio Garcia; Everado Jarmamillio; Garcia Parra Insulation, Inc.; J&J Construction; Jose Nino; Jose Manuel Garcia; Eason Construction, Inc.;

Vincent Morales d/b/a Morales Masonry and Miller Player & Associates,
Defendants,

Of Whom IMK Development Co., LLC,
Integrays Keowee Development, LLC,
William C. Cox and Larry D. Lollis are the , Appellants.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, the appellants request a 30-day extension of the deadline for filing the initial brief and designation of matter to be included in the record on appeal. The current deadline is December 2, 2015. This is the third request for an extension of this deadline.

Appellant's counsel posits the following extraordinary circumstances supporting this request:

- A. Counsel has been dealing with a family illness in Florence, South Carolina, which has required numerous unplanned trips to attend to the family member who has been hospitalized.
- B. Counsel has been dealing with unexpected storm damage at his home, including dealing with water damage and foundation damage.

December 2, 2015

Respectfully Submitted,



John S. Nichols, SC Bar # 4210
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THOMPSON & DELGADO
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(803) 779-8995 (facsimile)

Attorneys for Appellants

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Of Whom Stoneledge at Lake Keowee Owners' Association, Inc. is the, Respondent,

v.

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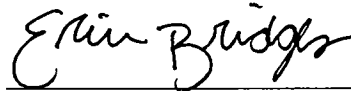
Vincent Morales d/b/a Morales Masonry and Miller Player & Associates,
Defendants,

Of Whom IMK Development Co., LLC,
Integrays Keowee Development, LLC,
William C. Cox and Larry D. Lollis are the , Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel for the Respondent with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following address:

Robert T. Lyles, Jr.
Lyles & Lyles, LLC
PO Box 773
Charleston, SC 29402



Erin Bridges
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC

December 2, 2015
Columbia, South Carolina



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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SC Court of Appeals

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RE: Stoneledge v. IMK Dev. (Integrays Keowee)
Case Tracking No.: 2015-000343

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in regards to this case. I have also enclosed a proof of service of this document upon counsel for Respondent and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: Cynthia B. Brown, Esquire
R. Patrick Smith, Esquire
Robert T. Lyles, Jr., Esquire