

78033

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2010-CP-26-03901

RECEIVED
DEC 03 2015
SC Court of Appeals

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., Mary Mychajlluk, 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, Bonnie Stone a/k/a Bonny Stone, DJL Construction Company, LLP, Adrian Mondragon, individually and d/b/a Mondragon Construction, Inc., and Glen Causey,.....Defendants,

Of Whom, Chuck's Construction Co., Inc. is 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, Inc. is the.....Respondent.

RESPONDENT, CHUCK'S CONSTRUCTION, INC.'S,
MOTION FOR EXTENSION OF TIME
TO FILE FINAL BRIEF

Now comes the Respondent, Chuck's Construction, Inc., and moves pursuant to Rule 263(b) for a twenty (20) day extension of time to complete Respondent's Final Brief in this matter. Respondent's brief is due on December 2, 2015, but cannot complete the process of preparing the brief in accordance with Rule 211, SCACR on December 2, 2015. Therefore, Respondent requests a twenty (20) day extension of time to submit the final brief.

Respectfully Submitted,



James Christopher Clark
SC Bar No.: 68434
Christina A. Bisset
SC Bar No.: 77368
McAngus, Goudelock & Courie, LLC
Post Office Box 1349
Founders Centre
2411 N. Oak St, Suite 401 (29577)
Myrtle Beach, South Carolina 29578
(843) 848-6000

Attorneys for Respondent,
Chuck's Construction, Inc.

December 2, 2015

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2010-CP-26-03901

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., Mary Mychajlluk, 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, Bonnie Stone a/k/a Bonny Stone, DJL Construction Company, LLP, Adrian Mondragon, individually and d/b/a Mondragon Construction, Inc., and Glen Causey,.....Defendants,

Of Whom, Chuck's Construction Co., Inc. is 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, Inc. is the.....Respondent.

RECEIVED

PROOF OF SERVICE

DEC 03 2015

SC Court of Appeals

I certify that I have served the Respondent, Chuck's Construction, Inc.'s, Motion for
Extension of Time to File Final Brief on the following by depositing a copy of it in the United
States Mails, postage prepaid, on December 2, 2015, addressed to their attorneys of
record as follows:

Stacy L. Stanley, Esquire
V. Denise Hamilton
Stanley Law Firm
3303 Highway 9 East
Little River, SC 29566
Attorney for Appellant

G. Michael Smith, Esquire
Thompson & Henry, P.A.
1300 Second Avenue
P.O. Box 1740
Conway, SC 29528
Attorney for Speedee Concrete, Inc.

Stephanie Burton, Esquire
Gibbes Burton, LLC
308 East Saint John Street
Spartanburg, SC 29302
**Attorney for AB Consulting
Engineers**

Christina A Bisset
James Christopher Clark
SC Bar No.: 68434
Christina A. Bisset
SC Bar No.: 77368
McAngus, Goudelock & Courie, LLC
Post Office Box 1349
Founders Centre
2411 N. Oak St, Suite 401 (29577)
Myrtle Beach, South Carolina 29578
(843) 848-6000
Attorneys for Respondent,
Chuck's Construction, Inc.

Reply To

CHRISTINA A. BISSET
Direct Dial: (843) 848-6008
christina.bissett@mgclaw.com

December 2, 2015

RECEIVED
DEC 03 2015
SC Court of Appeals

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

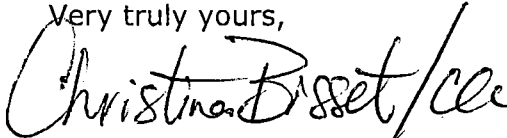
RE: Rivergate HOA vs. WW & LB Development Company, et al / vs. Chuck's
Construction, et al.
Liberty Mutual Claim No.09050880
Civil Action No.: 2015-000248
Carrier Claim No.: 5260032107 & 09050880-001
MGC File No.: 20216.09088

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of Respondent,
Chuck's Construction, Inc.'s, Motion for Extension of Time to File Final Brief in the
above-referenced case. Kindly file this document with the court and return a clocked-in
copy of the same to me in the envelope provided.

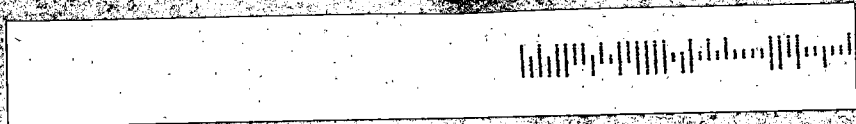
By copy of this letter, I am serving counsel of record with the above-referenced
Motion for Extension of Time.


Thanking you in advance for your assistance.

Very truly yours,

Christina A. Bissett

/_cc
Enclosures

cc: Stacy L. Stanley, Esquire
G. Michael Smith, Esquire
Stephanie Burton, Esquire



UNITED STATES POSTAGE

 PITNEY BOWES
 02 1P \$ 002.080
 0000839477 DEC 02 2015
 MAILED FROM ZIP CODE 29577

mgc | INSURANCE
 DEFENSE

20216.09088/CAB/_cc
 The Honorable Jenny Abbott Kitchings
 South Carolina Court of Appeals
 1015 Sumter Street
 Columbia, South Carolina 29201

RECEIVED

DEC 03 2015

SC Court of Appeals

