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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

**RECEIVED**

MAR 03 2016

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; Herberito 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,  
Integrys Keowee Development, LLC,  
William C. Cox and Larry D. Lollis are the , ..... Appellants.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, the appellants request a 10-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 March 4, 2016. This is the sixth request for an extension of this deadline.

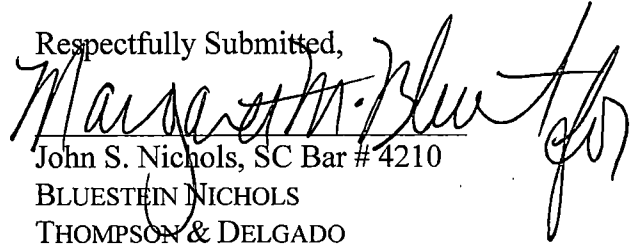
Appellants' counsel posits the following extraordinary circumstances supporting this request:

- A. Appellant's counsel continues to deal with family health situations in Florence, South Carolina, which have taken an unexpected and inordinate amount of time;
- B. Counsel has also been engaged in a matter in the Supreme Court's original jurisdiction that has been expedited;
- C. The material in this appeal is vast and extensive, involving thousands of pages of pleadings, memoranda and testimony. Counsel has been diligently reviewing the material but briefing has taken more than the normal amount of time.
- D. These challenges notwithstanding, Counsel has completed the majority of the work on the brief and anticipates being able to file within the deadline established by this final extension request.

/Signature page attached

March 3, 2016

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Margaret M. Bluestein". The signature is written in black ink and is positioned above the typed name and address.

John S. Nichols, SC Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, South Carolina 29202

(803) 779-7599

(803) 779-8995 (facsimile)

Attorneys for Appellants.

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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.

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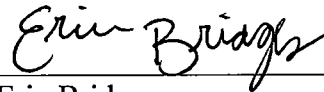
**PROOF OF SERVICE**

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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

March 3, 2016  
Columbia, South Carolina



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Erin Bridges  
BLUESTEIN, NICHOLS, THOMPSON  
& DELGADO, LLC



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

March 3, 2016

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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. (Integrys 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