

78989

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY **RECEIVED**
Court of Common Pleas

MAR 18 2016

The Honorable Tanya A. Gee, Circuit Court Judge

SC Court of Appeals

Lower Court Case No. 2014-CP-40-007229
Court of Appeals Case No. 2015-002584

GROUP III MANAGEMENT, INC.,

Respondent,

v.

SUNCRETE OF CAROLINA, INC., d/b/a
CRYSTAL POOLS,

Appellant.

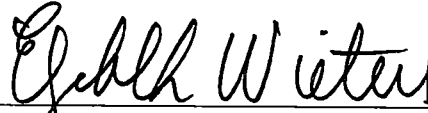
MOTION FOR EXTENSION OF TIME

NOW COMES the Appellant, Suncrete of Carolina, Inc., d/b/a Crystal Pools, by and through its undersigned counsel, and pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, respectfully hereby moves this Honorable Court for an extension of time to serve and file its Initial Brief.

On February 26, 2016, the Appellant received its hearing transcript on appeal, thereby making service of its Initial Brief due on March 26, 2016, pursuant to Rule 208(a)(1) of the South Carolina Appellate Court Rules. The Appellant respectfully requests an additional thirty (30) days to serve its Initial Brief, with the extended date for service being April 26, 2016.

The Appellant respectfully requests this Honorable Court grant its Motion for Extension of Time to serve and file its Initial Brief no later than April 26, 2016.

Respectfully submitted,



Alan R. Belcher, Jr., Esquire, Bar No. 71686
Elizabeth F. Wieters, Esquire, Bar No. 78064
40 Calhoun Street, Suite 550
Charleston, South Carolina 29401
Telephone: (843) 720-3460
*Attorneys for Appellant, Suncrete Of Carolina,
Inc., d/b/a Crystal Pools*

Dated: March 15, 2016

OTHER COUNSEL OF RECORD:

John C. Bruton, Jr., Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, Suite 2200
Post Office Box 11889 (2911-1889)
Columbia, South Carolina 29201
(803) 779-3080

Everette L. Wooten, Jr., Esquire
Wooten and Coley
P.O. Box 1555
Kinston, North Carolina 28503
(252) 523-8000
Attorneys for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

MAR 18 2016

The Honorable Tanya A. Gee, Circuit Court Judge
SC Court of Appeals

Lower Court Case No. 2014-CP-40-007229
Court of Appeals Case No. 2015-002584

GROUP III MANAGEMENT, INC.,

Respondent,

v.

SUNCRETE OF CAROLINA, INC., d/b/a
CRYSTAL POOLS,

Appellant.

PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension of Time** upon the Respondent by depositing a copy of same in the United States Mail, First Class postage prepaid, on March 15, 2016, addressed to Respondent's attorneys of record, addressed as follows:

John C. Bruton, Jr., Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, Suite 2200
Post Office Box 11889 (2911-1889)
Columbia, South Carolina 29201

Everette L. Wooten, Jr., Esquire
Wooten and Coley
P.O. Box 1555
Kinston, North Carolina 28503

(Signature appears on succeeding page)



Alan R. Belcher, Jr., Esquire, Bar No. 71686

Elizabeth F. Wieters, Esquire, Bar No. 78064

40 Calhoun Street, Suite 550

Charleston, South Carolina 29401

Telephone: (843) 720-3460

*Attorneys for Appellant, Suncrete Of Carolina,
Inc., d/b/a Crystal Pools*

Dated: March 15, 2016

H | B | S HALL BOOTH SMITH, P.C.

Alan Belcher
P: (843) 720-3478
E: abelcher@hallboothsmith.com

40 Calhoun Street, Suite 550
Charleston, SC 29401
W: www.hallboothsmith.com
P: (843) 720-3460 F: (843) 720-3479

RECEIVED

MAR 18 2016

March 15, 2016

SC Court of Appeals

VIA U.S. MAIL

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

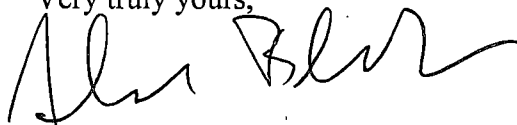
RE: *Group III Management, Inc. v. Suncrete of Carolina, Inc., d/b/a Crystal Pools*
Lower Court Case No.: 2014-CP-40-007229
Court of Appeals Case No.: 2015-002584

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Appellant's Motion for Extension of Time with regard to the above-referenced matter. Also enclosed is our firm's check in the amount of \$25.00, representing the motion filing fee.

I have included an extra copy of the Motion for Extension of Time, and would appreciate your returning the filed copy to our office in the enclosed self-addressed stamped envelope. Thank you for your assistance in this matter. If you have any questions and/or concerns, please do not hesitate to contact our office.

Very truly yours,



Alan Belcher

AB/sb
Enclosure

cc: John C. Bruton, Jr., Esq. (via U.S. Mail)
Everette L. Wooten, Jr., Esq. (via U.S. Mail)
The Honorable Jeanett W. McBride (Clerk of Court Richland County) (via U.S. Mail)
Ali Felschow (via email)

H|B|S

HALL BOOTH SMITH, P.C.
40 Calhoun St.
Suite 550
Charleston, SC 29401

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

RECEIVED
MAR 18 2016
SC Court of Appeals