

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

7920

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APPEAL FROM LEXINGTON COUNTY  
In the Court of Common Pleas

APR 15 2016

William P. Keesley, Presiding Judge

SC Court of Appeals

Appellate Case No. 2014-001519

McGuinn Construction Management, Inc.,.....Appellant,

v.

Saul Espino and Mara Espino,.....Respondents,

and

Saul Espino and Mara Espino,.....Respondents,

v.

Gates Commons, LLC, S. Wade McGuinn, Individually,  
and Town of Lexington, .....Defendants,

Of whom Town of Lexington is.....Appellant.

**MOTION FOR EXTENSION OF TIME**

The undersigned, as counsel for Appellant McGuinn Construction Management, Inc., hereby moves for a Ten (10) day extension of time to file a Return to the Respondents' Petition for Rehearing filed on April 7, 2016. This Motion is made on the grounds that Appellant needs additional time to respond to the Petition. This extension request is not intended for purposes of delay. Further, there would be no prejudice to the parties by an extension of time. By the undersigned's calculations the extension, if granted, would

extend Appellant's deadline for filing its Return to Respondents' Petition for Rehearing to April 27, 2016.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing of its Return to Respondents' Petition for Rehearing until April 27, 2016.

Respectfully submitted,

By: 

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S. Jahue Moore  
John C. Bradley, Jr.  
MOORE TAYLOR LAW FIRM, PA  
1700 Sunset Boulevard  
West Columbia, SC 29169  
803-796-9160  
803-791-8410 (Fax)  
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Attorneys for Appellant McGuinn  
Construction Management, Inc.

West Columbia, SC  
April 15, 2016

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and Town of Lexington, .....Defendants,

Of whom Town of Lexington is.....Appellant.

**PROOF OF SERVICE**

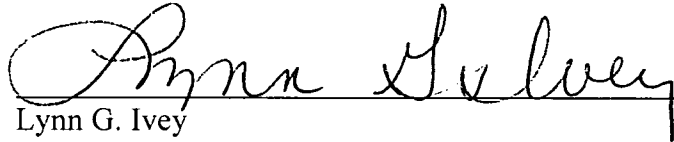
I, Lynn G. Ivey, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the below Motion for Extension of Time to File Return to Respondents' Petition for Rehearing upon counsel of record, by placing a copy of same in the United States mail in an envelope with sufficient postage affixed thereto, addressed as listed below.

Andrew F. Lindemann  
Davidson & Lindemann, P.A.  
P.O. Box 8568  
Columbia, SC 29202-8568

Andrew A. Aun  
Aun & McKay, P.A.  
P. O. Box 3568  
Irmo, SC 29063

John S. Nichols, Esquire  
Blake Hewitt, Esquire  
Bluestein Nichols Thompson & Delgado  
PO Box 7965  
Columbia, SC 29202

DOCUMENT(S): 1. Motion for Extension of Time to File Return to  
Respondents' Petition for Rehearing

  
Lynn G. Ivey

West Columbia, South Carolina  
April 15, 2016



April 15, 2016

The Honorable Jenny Abbott Kitchings  
Court of Appeals Clerk of Court  
P.O. Box 11629  
Columbia, SC 2921  
**VIA HAND DELIVERY**

RE: McGuinn Construction Management, Inc. v. Saul Espino and Mara  
Espino  
Case No. 2014-001519

Dear Ms. Kitchings:

Enclosed for filing please find the original and five copies of a Motion for Extension in regards to this case. I have also enclosed a proof of service of this document on counsel for respondents and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you in advance for your assistance in this matter.

With kindest regards I am,

Yours very truly,

Lynn G. Ivey  
Assistant to John C. Bradley, Jr.

Enclosures

cc w/encl.: Andrew A. Aun, Esquire (Counsel for Plaintiffs/Defendants Espino)  
Bradford T. Cunningham, Esquire (Counsel for Defendant Town of Lexington)  
Andrew F. Lindemann, Esquire (Counsel for Gates Commons, LLC)

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APR 15 2016

SC Court of Appeals

S. Jahue Moore\*  
J. Mark Taylor\*  
C. Vance Stricklin, Jr.  
James Edward Bradley†  
Sheila McNair Robinson  
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John C. Bradley, Jr.  
Melissa K. Moore  
William B. Fortino  
Ralph Nichols Riley, Jr.  
Amber Cary Fulmer  
Sarah Taylor Cassidy  
Gregory R. Close  
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OF COUNSEL  
Billy C. Coleman  
RETIRED