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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

The Honorable Alexander S. Macaulay, Circuit Court Judge

RECEIVED

JUN 13 2016

SC Court of Appeals

Lower Court Case No. 2009-CP-37-00652
Court of Appeals Case No. 2015-000417

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,

Respondents,

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 FirstSource Southeast Group, Mike Green, Southern Concrete Specialties, Carl Compton d/b/a Compton Enterprise d/b/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, Inc., 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, Upstate Utilities, Inc., MJG Construction and Homebuilders, Inc. d/b/a MJG Construction, KMAC of the Carolinas, Inc., Eufacio Garcia, Everado Jarmamillo, Garcia Parra Insulation, Inc., J&J Construction, Jose Nino, Jose Manuel Garcia, Eason Construction, Inc., and Vincent Morales d/b/a Morales Masonry,
(Of Whom Bostic Brothers Construction, Inc., is the Appellant)

Appellants.

MOTION FOR EXTENSION OF TIME


NOW COMES the Appellant, Bostic Brothers Construction, Inc., by and through its undersigned counsel, and pursuant to Rule 263 of the South Carolina Appellate Court Rules, respectfully hereby moves this Honorable Court for an extension of time to file and serve its Record on Appeal.

On June 2, 2016, the Appellant filed its Reply Brief to Respondents Initial Brief, thereby making the filing and service of its Record on Appeal due on July 3, 2016, pursuant to Rule 210(a) of the South Carolina Appellate Court Rules. Due to the voluminous trial transcript, documents pertinent to this appeal, and the complexity of the issues submitted for appeal, the Appellant respectfully requests an additional thirty (30) days from the aforementioned due date to serve its Record on Appeal, with the extended date for filing and service being August 3, 2016.

WHEREFORE, the Appellant, Bostic Brothers Construction, Inc., respectfully requests this Honorable Court grant its Motion for Extension of Time to serve and file its Record on Appeal no later than August 3, 2016.

(Signature appears on succeeding page)

Respectfully submitted,



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Paul Trainor, Esq., Bar No. 101405
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*Attorneys for Appellant, Bostic Brothers
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COUNSEL OF RECORD:

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Attorneys for Marick Home Builders, LLC and Rick Theonnes

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Ester Moran Mentado, Socorro Castillo Montel, Upstate Utilities, Inc., MJG Construction and Homebuilders, Inc. d/b/a MJG Construction, KMAC of the Carolinas, Inc., Eufacio Garcia, Everado Jarmamillo, Garcia Parra Insulation, Inc., J&J Construction, Jose Nino, Jose Manuel Garcia, Eason Construction, Inc., and Vincent Morales d/b/a Morales Masonry,
(Of Whom Bostic Brothers Construction, Inc., is the Appellant)

Appellants.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time upon the Respondents by depositing a copy of same in the United States Mail, First Class postage prepaid, on June 29th, 2016, addressed to Respondents' attorneys of record, Robert T. Lyles, Jr., Esquire, Lyles & Lyles, LLC, PO Box 773, Charleston, SC 29402.

Also served by the same means are the following: Cynthia Buck Brown, Esquire and R. Patrick Smith, Esquire of Harper Lambert & Brown, PA, P.O. Box 908, Greenville, SC 29602 (attorneys for IMK Development Co., LLC, Integrys Keowee Development, LLC, William C. Cox, and Larry Lollis), Jason M. Imhoff, Esquire and Chad M. Graham, Esquire of The Ward Law Firm, P.A., P.O. Box 5663, Spartanburg, SC 29304 (attorneys for Marick Home Builders, LLC and Rick Thoennes).



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June 8, 2016

RECEIVED

JUN 13 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: *Stoneledge v. Bostic Brothers Construction*
Lower Court Case No. 2009-CP-37-00652
Court of Appeals Case No. 2015-000417

Dear Judge Kitchings:

Enclosed please find the original and six copies of Appellant's Motion for Extension of Time, along with a Proof of Service of same, 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

Enclosures

cc: Robert T. Lyles, Jr., Esq. (via U.S. Mail)
Cynthia Buck Brown, Esq. (via U.S. Mail)
R. Patrick Smith, Esq. (via U.S. Mail)
Jason M. Imhoff, Esq. (via U.S. Mail)
Chad M. Graham, Esq. (via U.S. Mail)

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SC Ct

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H|B|S

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The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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