

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

**RECEIVED**

JUL 20 2016

APPEAL FROM LEXINGTON COUNTY  
In the Court of Common Pleas

**SC SUPREME COURT**

William P. Keesley, Presiding Judge  
James W. Johnson, Jr. Presiding Judge

Case No. 2005-CP-32-2712  
Case No. 2008-CP-32-4192  
2016-UP-138 (S.C.Ct. App., filed March 23, 2016)

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 twenty (20) day extension of time to file a Return to the Petition for Certiorari. This Motion is made on the grounds that Respondents' need 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. The undersigned has communicated with counsel for Petitioners who consent to the extension. By the undersigned's calculations the extension, if granted, would extend Appellant's deadline for filing the Return until August 9, 2016.

WHEREFORE, Appellant respectfully prays that this Court extend the deadline for the service and filing its Return to Petition for Rehearing until August 9, 2016.

Respectfully submitted,

By:   
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John C. Bradley, Jr.  
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Attorneys for Appellant McGuinn  
Construction Management, Inc.

West Columbia, SC  
July 20, 2016

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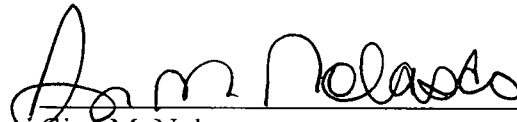
**PROOF OF SERVICE**

I, Gina M. Nolasco, an employee of Moore Taylor Law Firm, P.A., certify that I have on this day effected service of the Motion for Extension of Time to file a Return for Certiorari 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:

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Gina M. Nolasco

West Columbia, South Carolina

July, 20, 2016