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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Brooks P. Goldsmith, Circuit Court Judge

RECEIVED
AUG 05 2016
SC Court of Appeals

Case No.: 2012-CP-07-2169
Appellate Case No.: 201-000247

Lake Estates Property Owners Association, Inc.,.....Appellant,

v.

Lake Estates, LLC; Estate Builders, Inc.; Estate Home Builders, LLC; Arkiteknic, Inc.; David Sladek Engineering Company; Jenkins Plumbing Company, LC; American Paving Design, LLC; American Paving Design, Inc.; Miller Construction of the Lowcountry, Inc.; Whitaker Laboratory, Inc.; Heritage Plastering & Stucco, LLC; CMC Steel Works, Inc.; Savannah Hardscapes, Inc.; Superior Heating & Air, Inc.; Michael Stoghill d/b/a Advanced Residential Plumbing; Warren Flick Associates, LLC; Warren Flick; Russell Miller; Russell Miller, Jr., and Robert Miller, Defendants,

Of Whom Lake Estates, LLC; Estate Builders, Inc.; and
Miller Construction of the Lowcountry, Inc.; areRespondents.

MILLER CONSTRUCTION OF THE LOWCOUNTRY, INC.'S
MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

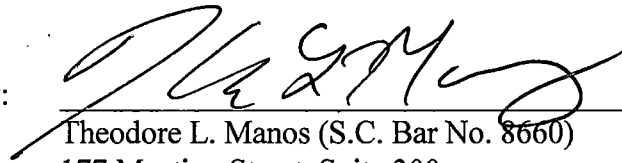
Theodore L. Manos (S.C. Bar No. 8660)
ROBERTSON, HOLLINGSWORTH & FLYNN, LLC
177 Meeting Street, Suite 300
Charleston, SC 29401
Telephone: (843) 723-6470
Email: tlm@roblaw.net
Attorneys for Respondent Miller Construction of the Lowcountry, Inc.

Respondent Miller Construction of the Lowcountry, Inc. ("Miller") hereby moves, pursuant to Rule 240, SCACR, for an order granting a thirty (30) day extension of time to file its Initial Brief. The Court has not previously extended the time for filing its Initial Brief. Miller has requested and is awaiting the trial exhibits for use in its brief. The undersigned counsel consulted with Andrew S. Platte, counsel for the Appellant, and he does not object to this request. The undersigned has also consulted with O. Edworth Liipfert, III, counsel for Respondent Estate Builders, Inc., and he has no objection. The undersigned is awaiting a response from W. James Flynn, counsel for Respondent Lake Estates, LLC. The current deadline for the filing of Miller's brief is August 26, 2016. If Miller's request is granted, its new deadline will be September 26, 2016.

Respectfully,

ROBERTSON HOLLINGSWORTH & FLYNN, LLC

By:



Theodore L. Manos (S.C. Bar No. 8660)

177 Meeting Street, Suite 300

Charleston, SC 29401

Telephone: (843) 723-6470

Facsimile: (843) 853-9045

Email: tlm@roblaw.net

**Attorneys for Respondent Miller Construction of
the Lowcountry, Inc.**

August 4, 2016
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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The Honorable Brooks P. Goldsmith, Circuit Court Judge

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Of Whom Lake Estates, LLC; Estate Builders, Inc.; Miller Construction of the Lowcountry, Inc., Warren Flick and Russell Miller are the Respondents.

PROOF OF SERVICE

This hereby certifies that Respondent Miller Construction of the Lowcountry, Inc. Has served a copy of its Motion for an Extension of time to file their Initial Brief in the above-referenced matter via US Regular Mail upon all parties listed below on this the 4th day of August, 2016:

Andrew S. Platte, Esquire
Gibson Solomonos, Esquire
Speights & Runyan

RECEIVED
AUG 05 2016
SC Court of Appeals

2015 Boundary Street, Ste. 239
Beaufort, SC 29902

Counsel for Lake Estates Property Owners Association, Inc.

O. Edworth Liipfert, III, Esquire
Griffith, Sadler & Sharp, PA
P.O. Drawer 570
Beaufort, SC 29901


**Attorneys for Estate Builders, Inc.,
Russell Miller, and Russell Miller Jr.**

W. James Flynn, Esquire
Goodman McGuffey Lindsey & Johnson, LLP
147 Wappoo Creek Drive, Suite 204
Charleston, SC 29412

**Attorney for Lake Estates, LLC
and Warren FLick**

August 4, 2016
Charleston, South Carolina

By:



ROBERTSON HOLLINGSWORTH & FLYNN, LLC
ATTORNEYS AT LAW

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R. Patrick Flynn
Theodore L. Manos
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Michael E. Wright
Christopher M. Ramsey (SC, GA)
S. Wallace Carnwath, III (SC, NC)
Rose Beth Grossman

August 4, 2016

VIA FEDERAL EXPRESS AIR BILL NO.: 8097 1837 7961

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

RE: Appellate Case No.: 201-000247
Lake Estates Property Owners Association, Inc., Appellant,

v.

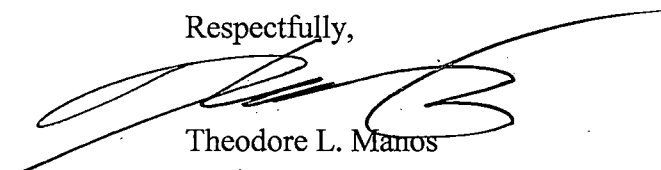
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Of Whom Lake Estates, LLC; Estate Builders, Inc.; Miller Construction of the Lowcountry, Inc., Warren Flick and Russell Miller are the Respondents.

Dear Ms. Kitchings:

Please find enclosed for filing with the Court the original and six (6) copies of Respondent Miller Construction of the Lowcountry, Inc.'s Motion for an Extension of time to file their Initial Brief in the above-referenced matter. We have also enclosed an extra copy and request you please return that after filing same in the prepaid postage, self-addressed envelop also enclosed herein.

Respectfully,



Theodore L. Manos

J

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
August 4, 2016
Page 2

TLM/ej
Enclosures

cc: Andrew S. Platte,
O. Edward Liipfert, III, Esquire
W. Gary, Flynn, Esquire

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FedEx Package
Express US Airbill

FedEx Tracking Number 8097 1839 8590

MUR 1

Form ID No. 0215

ROBERTSON & HOLLINGSWORTH

1 From
 Date 8-4-2016
 Sender's Name Teddy Manos Phone 843 723-6470
 Company ROBERTSON & HOLLINGSWORTH
 Address 177 MEETING ST STE 300
 City CHARLESTON State SC ZIP 29401-3204

2 Your Internal Billing Reference

3 To
 Recipient's Name Jenny Abbott Kitchings Phone 803-734-1890
 Company SC Court of Appeals
 Address 1220 Senate Street
 City Columbia State SC ZIP 29201



8097 1839 8590

4 Express Package Service

*To most locations.

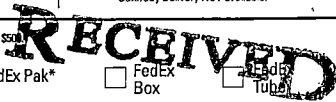
Packages up to 150 lbs.
For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day
 FedEx First Overnight
 FedEx Priority Overnight
 FedEx Standard Overnight

2 or 3 Business Days
 FedEx 2Day A.M.
 FedEx 2Day
 FedEx Express Saver

5 Packaging

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other



6 Special Handling and Delivery Signature Options

Saturday Delivery
 No Signature Required
 Direct Signature
 Direct Signature

AUG 05 2016

SC Court of Appeals

Does this shipment contain dangerous goods?

No Yes
 Dry Ice Cargo Aircraft Only

7 Payment Bill to:

Sender Recipient Third Party Credit Card Cash/Check

Total Packages Total Weight Credit Card Auth.

*Our liability is limited to US\$100 unless you declare a higher value.

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