

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 15 2016

SC Court of Appeals

APPEAL FROM THE BEAUFORT COUNTY
Court of Common Pleas

Brooks P. Goldsmith, Fourteenth Circuit Court Judge

CIVIL ACTION NO. 2012-CP-07-2169

APPELLATE CASE NO.: 201-000247

Lake Estates Property Owners Association, Inc.,Plaintiff/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 Low Country, 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 Defendants, Lake Estates, LLC; Estate Builders, Inc.; Miller Construction of the Low Country, Inc., Warren Flick, and Russell Miller,..... Respondents

**LAKE ESTATE, LLC'S MOTION FOR EXTENSION OF
TIME TO FILE INITIAL BRIEF**

W. James Flynn, Esq.
GOODMAN MCGUFFEY LINDSEY & JOHNSON LLP
1320 Main Street
Columbia, SC, 29201
(800) 404-6930
Attorney for Respondent Lake Estates, LLC

This 11th day of August, 2016.

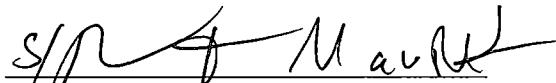
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Respondent Lake Estates, LLC hereby moves, pursuant to Rule 240, SCACR, for an order granting a thirty (30) day extension of time to file its Initial Brief. The Court has not previously extended the time for filing its Initial Brief. The undersigned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

Respectfully,

GOODMAN MCGUFFEY LLP

By:



W. James Flynn (SC Bar No. 15830)

1320 Main Street

Columbia, SC, 29201

Telephone: (800) 404-6930

Facsimile: (855) 642-5952

Email: jflynn@gmlj.com

Attorney for Respondent, Lake Estates, LLC,

August 11, 2016
Columbia, South Carolina

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Of Defendants, Lake Estates, LLC; Estate Builders, Inc.; Miller Construction of the Low Country, Inc., Warren Flick, and Russell Miller,..... Respondents

PROOF OF
SERVICE

This hereby certifies that Respondent Lake Estates, LLC. 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 11th day of August, 2016:

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

2015 Boundary Street, Ste. 239
Beaufort, SC 29902
Counsel for Lake Estates Property Owners Association, Inc.

O. Edworth Liipfert, III Esquire
Griffith, Sadler & Sharpe, PA
P.O. Drawer 570
Beaufort, SC 29901
Counsel for Estate Builders, Inc., Russell Miller, and Russell Miller Jr.

Theodore L. Manos
Robertson Hollingsworth & Flynn, LLC
177 Meeting Street, Suite 300
Charleston, SC 29401
Counsel for Miller Construction of the Lowcountry, Inc.

By: 
Sharon H. Dixon

August 11, 2016
Columbia, South Carolina



GOODMAN MCGUFFEY LLP

ATTORNEYS AT LAW
WWW.GMLJ.COM

W. JAMES FLYNN
Attorney at Law
Direct Dial: (803) 470-5016
Email: jflynn@gmlj.com
Admitted in SC & NC

REPLY TO:
1320 Main Street, suite 300
Columbia, SC 29201

TELEPHONE (803) 470-5016
FACSIMILE (855) 642-5952

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SC Court of Appeals

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

Re: Lake Estates Property Owners Association, Inc. v. Lake Estates, LLC.
Appellate Case No.: 201-000247
Our File No.: 3258-0003

Dear Ms. Kitchings:

Please find enclosed for filing with the Court the original and six (6) copies of Respondent Lake Estates, LLC's Motion for 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 envelope also enclosed herein.

Sincerely,

W. James Flynn

WJF:shd
Enclosures
cc: Andrew S. Platte, Esq.
O. Edworth Liipfert, III, Esq.
Theodore L. Manos, Esq.

Doc ID #3925996



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GOODMAN MCGUFFEY LLP
 ATTORNEYS AT LAW
 3340 PEACHTREE ROAD NE, SUITE 2100
 ATLANTA, GA 30326-1084

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The Honorable Jenny Abbott Kitchings
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