

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

RECEIVED

AUG 19 2016

The Honorable Tanya A. Gee, Circuit Court Judge

SC Court of Appeals

Lower Court Case No. 2014-CP-40-007229
Court of Appeals Case No. 2015-002584

GROUP III MANAGEMENT, INC.,

Respondent,

v.

SUNCRETE OF CAROLINA, INC., d/b/a
CRYSTAL POOLS,

Appellant.

APPELLANT'S MOTION FOR EXTENSION OF TIME

NOW COMES the Appellant, Suncrete of Carolina, Inc., d/b/a Crystal Pools, by and through its undersigned counsel, and pursuant to Rule 263(b) of the South Carolina Appellate Court Rules, respectfully hereby moves this Honorable Court for an extension of time to serve a copy of the Record on Appeal upon the Respondent and file with this Honorable Court a Proof of Service regarding same.

The current deadline is August 12, 2016, as the Appellant was served with the Respondent's Initial Brief on July 13, 2016, and pursuant to Rule 210(a) of the South Carolina Appellate Court Rules, service of a copy of the Record on Appeal is to be submitted within thirty (30) days. This is the first request for an extension of this deadline.

The Appellant respectfully requests this Honorable Court grant the Appellant a thirty (30) day extension of time to serve a copy of the Record on Appeal upon the Respondent and file a Proof of Service with this Honorable Court, thereby extending the deadline to no later than September 12, 2016.

WHEREFORE, the Appellant respectfully requests this Honorable Court grant its Motion for Extension of Time to serve a copy of the Record on Appeal upon the Respondent and file with this Honorable Court a Proof of Service attesting to its compliance no later than September 12, 2016.

Respectfully submitted,



Alan R. Belcher, Jr., Esquire, Bar No. 71686
Elizabeth F. Wieters, Esquire, Bar No. 78064
40 Calhoun Street, Suite 550
Charleston, South Carolina 29401
Telephone: (843) 720-3460
*Attorneys for Appellant, Suncrete Of Carolina,
Inc., d/b/a Crystal Pools*

Dated: August 16, 2016

OTHER COUNSEL OF RECORD:

John C. Bruton, Jr., Esquire
Haynsworth Sinkler Boyd, P.A.
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Attorneys for Respondent

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v.

SUNCRETE OF CAROLINA, INC., d/b/a
CRYSTAL POOLS,

Appellant.

PROOF OF SERVICE

I certify that I have served the **Appellant's Motion for Extension of Time** upon the Respondent by depositing a copy of same in the United States Mail, First Class postage prepaid, on August 16, 2016, addressed to Respondent's attorneys of record, addressed as follows:

John C. Bruton, Jr., Esquire
Haynsworth Sinkler Boyd, P.A.
1201 Main Street, Suite 2200
Post Office Box 11889 (2911-1889)
Columbia, South Carolina 29201

Everette L. Wooten, Jr., Esquire
Wooten and Coley
P.O. Box 1555
Kinston, North Carolina 28503

(Signature appears on succeeding page)



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40 Calhoun Street, Suite 550
Charleston, South Carolina 29401
Telephone: (843) 720-3460
*Attorneys for Appellant, Suncrete Of Carolina,
Inc., d/b/a Crystal Pools*

Dated: August 16, 2016

H|B|S HALL BOOTH SMITH, P.C.

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August 16, 2016

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SC Court of Appeals

VIA U.S. MAIL

South Carolina Court of Appeals
Clerk of Court
ATTN: JESSICA
Post Office Box 11629
Columbia, South Carolina 29211

RE: *Group III Management, Inc. v. Suncrete of Carolina, Inc., d/b/a Crystal Pools*
Lower Court Case No.: 2014-CP-40-007229
Court of Appeals Case No.: 2015-002584

Dear Jessica:

Enclosed please find the original and six copies of Appellant's Motion for Extension of Time 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 R. Belcher, Jr.

ARB/sb

Enclosure

cc: John C. Bruton, Jr., Esq. (via U.S. Mail)
Everette L. Wooten, Jr., Esq. (via U.S. Mail)
The Honorable Jeanett W. McBride (Clerk of Court Richland County) (via U.S. Mail)
Ali Felschow (via email)

Registered
08/16/2016
US POSTAGE \$02.40⁰⁰



ZIP 29401
011D11620770

H|B|S HALL BOOTH SMITH, P.C.
40 Calhoun St.
Suite 550
Charleston, SC 29401

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