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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

RECEIVED

MAY 08 2017

SC Court of Appeals

Case No.: 2014-CP-08-2424
Appellate Court Case No. 2016-2339

Patricia Damico, and Lenna Lucas, Individually and on behalf of all others similarly situated,
Joshua and Brettany Beutow, Edward and Sylvia Dengg, Jonathan and Theresa Douglass, Anthony
and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and
Cynthia Camara, and Matthew Collins Respondents,

v.

Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., Manale, Landscaping LLC,
Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC, Paragon Site
Constructors, Inc., Civil Site Environmental and Rick Bryant, Individually Defendants,

Of which Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super
Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC and Civil Site
Environmental are Respondents,

And

Lennar Carolinas, LLC Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometries Consulting, LLC,
Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete
Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete
Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators
Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez
Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders
FirstSource-Southeast Group, LLC, and Low Country Renovations and Siding,
LLP, Third-Party Defendants,



Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders FirstSource Southeast Group, LLC, are also Respondents,

And

Decor CorporationFourth-Party Plaintiff,
v.

Baranov Flooring, LLC, DJ Construction Services, LLC, Creative Wood Floors, LLC, Geraldo Cunha, Ebenezer Flooring, LLC, Emmanuel Flooring and Siding, LLC, Eusi Flooring and Covering, LLC, Nicolas Flores, Alexander Martinez, Isidru Mejia, Juan Perez, Ernesto M. Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, Jose Betio Pereira, Jose Paz Castro Hernandez, Divinio Aperecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastiao Luiz de Araujo, and John Does 1-4Fourth-Party Defendants.

**CIVIL SITE ENVIRONMENTAL'S
MOTION FOR EXTENSION OF TIME**

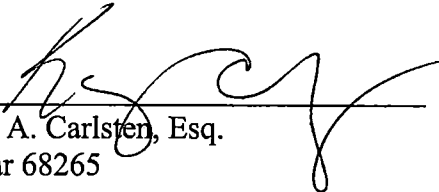
Respondent Civil Site Environmental, by and through its undersigned counsel, respectfully requests a thirty (30) day extension of time to file Respondent's Initial Brief and Designation of Matter for Record. Appellant consents to Respondent's request for additional time. The reason for this request is in part due to the workload of Respondent's counsel. Additionally, several other Respondents have also requested an extension of time and the undersigned anticipates joining in their arguments.

For the above-stated reasons, on behalf of Respondent Civil Site Environmental, I respectfully request the Court grant Respondent a thirty (30) day extension of time. If this Motion is granted, the Respondent's Initial Brief will be due on or before June 5, 2017. This is movant's first request for an extension of this deadline.

Respectfully Submitted,

CARLOCK, COPELAND & STAIR, LLP

By:



Kathy A. Carlsten, Esq.
SC Bar 68265

Counsel for Civil Site Environmental

40 Calhoun Street
Charleston, South Carolina
Dated: May 4, 2017

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and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and
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v.

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Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC, Paragon Site
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And

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Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete
Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators
Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez
Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders
FirstSource-Southeast Group, LLC, and Low Country Renovations and Siding,
LLP, Third-Party Defendants,

Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders FirstSource Southeast Group, LLC, are also Respondents,

And

Decor Corporation..... Fourth-Party Plaintiff,
v.

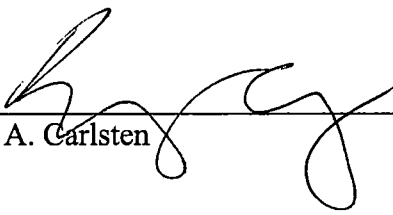
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PROOF OF SERVICE

The undersigned hereby certifies that on the date indicated below she served counsel with a copy of the Motion for Extension of Time by mailing copies of same via electronic mail and United States Mail with first class postage prepared to the following addresses:

Jenna K. McGee, Esquire
F. Elliott Quinn, IV, Esquire
James Werner. Esquire
Parker Poe, Adams & Bernstein, LLP
200 Meeting St, Suite 301
Charleston, SC 29401

This 4th day of May, 2017.


Kathy A. Carlsten

LAW OFFICES
CARLOCK, COPELAND & STAIR, LLP

A LIMITED LIABILITY PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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Atlanta, Georgia 30303-1740
(404) 522-8220

REPLY TO SC OFFICE

May 4, 2017

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


Re: Patricia Damico, *et al.* v. Civil Site Environmental, *et al.*
Case No.: 2014-CP-08-02424
Appellate Case No.: 2016-2339
CCS File No.: 3520-52322

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Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of Civil Site Environmental's Motion for Extension of Time and Proof of Service in the above-referenced matter. Upon filing, please return one (1) clocked copy of the Motion and Proof of Service to me in the self-addressed, postage paid envelope enclosed. Also enclosed is our firm's check in the amount of \$25.00 for the corresponding fee.

Sincerely,


Kathy A. Carlsten

KAC:tjr
Enclosure

cc: All Counsel of Record (with enclosures – via email only)

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UNITED STATES POSTAGE

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**CARLOCK
 COPELAND**
 CIVIL LITIGATION

CARLOCK COPELAND & STAIR, LLP
 40 Calhoun Street, Suite 400
 Charleston, SC 29401-3531

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

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