

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

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

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

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MAY 08 2017

SC Court of Appeals

Patricia Damico, and Lerma Lucas, Individually and on behalf of all others similarly situated; Joshua and Brittany 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, LLCAppellant,

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

Décor Corporation Fourth-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, Isidni 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, Sebastio Luiz de Araujo, and John Does 1-4 Fourth-Party Defendants.

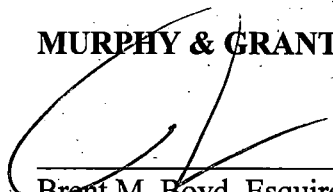
**RESPONDENTS COASTAL CONCRETE SOUTHEAST, LLC AND COASTAL
CONCRETE SOUTHEAST II, LLC'S
MOTION FOR EXTENSION OF TIME**

Respondents Coastal Concrete Southeast, LLC and Coastal Concrete Southeast II, LLC, by and through its undersigned counsel, with the consent of the Appellant, respectfully requests a thirty (30) day extension of time to file Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal. The reason for this request is in part due to the workload of counsel for the Respondents. Additionally, counsel for other Respondents have also requested an extension and the undersigned anticipates joining in their arguments.

For the above-stated reasons, on behalf of Respondent, 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,

MURPHY & GRANTLAND, P.A.



Brent M. Boyd, Esquire
Robert M. Peele, III, Esquire
4406-B Forest Drive (29206)
Post Office Box 6648
Columbia, South Carolina 29260
(803) 782-4100, ext. 1210
(803) 782-4140 (facsimile)
Email: bboyd@murphygrantland.com

***Attorney for Coastal Concrete Southeast, LLC and
Coastal Concrete Southeast II, LLC***

Columbia, South Carolina
May 4, 2017

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v.

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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

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And

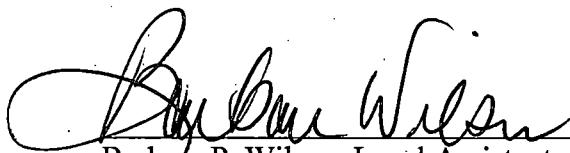
Décor Corporation Fourth-Party Plaintiff,
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PROOF OF SERVICE

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 by United States Mail with first class postage prepaid to the following address:

Jenna K. McGee
James Werner
Frederick E. Quinn, IV
PARKER POE ADAMS & BERSTEIN, LLP
200 Meeting Street, Ste. 301
Charleston, SC 29401


Barbara P. Wilson, Legal Assistant

Columbia, South Carolina
May 5, 2017



MURPHY & GRANTLAND, P.A.

Brent M. Boyd
Direct dial 803-454-1210
bboyd@murphygrantland.com

May 4, 2017

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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Patricia Damico and Lenna Lucas, et al. v. Coastal Concrete Southeast II, et al.
Appellate Case No.: 2016-2339
Civil Action No.: 2014-CP-08-2424
M&G File No.: 5010-0008

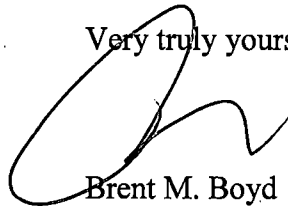
Dear Ms. Kitchings:

Enclosed please find an original and one (7) copies of a Motion for Extension in the above matter. We have also enclosed Proof of Service on Counsel for the Appellant and our firm check in the amount of \$25.00 for filing this motion. Please return the additional filed copy to us in the enclosed return envelope.

Thank you for your assistance.

With kind regards, I am

Very truly yours,



Brent M. Boyd

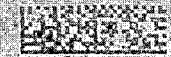
BMB/ppr

Enclosures

cc: Counsel of Record (w/Enclosures)

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Murphy & Grantland, P.A.
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Columbia, South Carolina 29260

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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