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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

Appellate Case, No. 2016-2339
Case No. 2014-CP-08-2424

RECEIVED

JUL 14 2017

SC Court of Appeals

Patricia Damico and Lenna 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, LLC, Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometrics 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, Costal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Décor 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.

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

**APPELLANT LENNAR CAROLINAS, LLC'S MOTION FOR AN EXTENSION
OF TIME TO FILE ITS INITIAL CONSOLIDATED REPLY BRIEF**

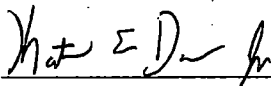
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Attorneys for Appellant Lennar Carolinas, LLC

Appellant Lennar Carolinas, LLC, pursuant to Rule 240(a), SCACR, respectfully requests and extension of (4) days to file its Initial Consolidated Reply Brief, up to and including Friday July 21, 2017.

Appellant Lennar Carolinas, LLC has a motion to file a consolidated initial reply brief and for permission to exceed the twenty-five (25) page limit in its consolidated reply brief currently pending before the Court. In that Motion, Appellant Lennar Carolinas, LLC requested an extension of time of ten (10) days from the date the last Respondents' Brief is filed within which to file a consolidated reply brief. In addition to the reasons set forth in Appellant Lennar Carolinas, LLC's pending motion, Appellant Lennar Carolinas, LLC contends that good cause exists to grant this Motion for an Extension of Time based upon (1) Appellant Lennar Carolinas, LLC effort to reply to the seven (7) Respondents' Briefs that have been filed in a single consolidated brief; (2) Appellant Lennar Carolinas, LLC's counsel's work schedule; and (3) the complexity and number of issues that necessitate a reply.

WHEREFORE, Appellant Lennar Carolinas, LLC respectfully requests an order granting an extension of (4) days to file its Initial Consolidated Reply Brief, up to and including Friday July 21, 2017.

 for James Lynn Werner
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July 14, 2017
Columbia, South Carolina

Attorneys for Appellant Lennar Carolinas, LLC

THE STATE OF SOUTH CAROLINA
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APPEAL FROM BERKELEY COUNTY
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J.C. Nicholson, Jr., Circuit Court Judge

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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

Lennar Carolinas, LLC, Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometrics 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, Costal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Décor 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

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

PROOF OF SERVICE

The undersigned hereby certifies that on July 14, 2017, copies of the foregoing **APPELLANT LENNAR CAROLINA, LLC'S MOTION FOR AN EXTENSION OF TIME TO FILE ITS INITIAL CONSOLIDATED REPLY BRIEF** was served on all counsel of record by placing a copy in the United States Mail, first class postage prepaid, addressed as follows:

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July 14, 2017

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

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JUL 14 2017

SC Court of Appeals

Re: *Patricia Damico, et al. v. Lennar Carolinas, LLC, et al.*
Case No. 2014-CP-08-2424; Appellate Case No. 2016-2339

Dear Mrs. Kitchings:

Enclosed please find the original and seven (7) copies of Appellant Lennar Carolinas, LLC's Motion for Extension of Time to File Its Initial Consolidated Reply Brief regarding the above-referenced matter.

We have also enclosed a check in the amount of \$25.00 for the filing fee. Please return a filed-stamped copy with our courier. As evidenced by the attached Proof of Service and by copy of this letter we are providing counsel of record with a copy of same.

Sincerely,

Katon E. Dawson, Jr.

KED:bg
Enclosures

cc: All Counsel of Record

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