

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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OCT 26 2017

S.C. SUPREME COURT

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

William P. Keesley, Circuit Court Judge  
James W. Johnson, Jr., Circuit Court Judge

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Case No. 2005-CP-32-2712  
Case No. 2008-CP-32-4192  
2016-UP-138 (S.C. Ct. App. filed March 23, 2016)

Appellate Case No. 2016-001291

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McGuinn Construction Management, Inc., ..... Respondent,

v.

Saul Espino and Mara Espino, ..... Petitioners.

And

Saul Espino and Mara Espino, ..... Petitioners,

v.

Gates Commons, LLC, S. Wade McGuinn,  
Individually, and Town of Lexington, ..... Defendants,

Of whom

Town of Lexington is, ..... Respondent.

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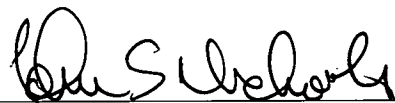
**MOTION FOR EXTENSION**

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Pursuant to Rule 240, SCACR, the Petitioners request a 20-day extension of the deadline for filing and serving their brief of petitioners in this case. The current deadline is October 30, 2017. This is the first extension request during the certiorari proceedings.

Because this is a certiorari case, this request is governed by the Court's order *RE: Extensions in Cases Seeking a Petition for a Writ of Certiorari to Review a Decision of the South Carolina Court of Appeals*, S.C. Sup. Ct. Order dated July 16, 2014 (Shearouse Adv. Sh. No. 28 at 1). The grounds for this request are that petitioners' counsel does not expect to be able to complete a satisfactory brief within the current deadline.

Respectfully Submitted,



Blake A. Hewitt, SC Bar # 73674  
BLUESTEIN THOMPSON SULLIVAN, LLC  
Post Office Box 7965  
Columbia, South Carolina 29202  
(803) 779-7599  
(803) 779-8995 (facsimile)  
blake@bluesteinattorneys.com

October 26, 2017

Attorney for Petitioners

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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v.

Gates Commons, LLC, S. Wade McGuinn,  
Individually, and Town of Lexington, ..... Defendants,

Of whom

Town of Lexington, ..... Respondent.

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**PROOF OF SERVICE**

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The undersigned hereby certifies that on the date indicated below she served counsel for the Respondents with a copy of the *Motion for Extension* by mailing copies of the same by United States Mail with first class postage prepaid to the following addresses:

S. Jahue Moore  
John C. Bradley, Jr.

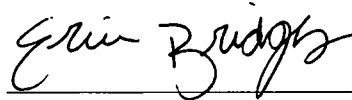
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OCT 26 2017

S.C. SUPREME COURT

Moore Taylor Law Firm, PA  
P.O. Box 5709  
West Columbia, SC 29171

Andrew F. Lindemann  
Davidson & Lindemann, PA  
P.O. Box 8568  
Columbia, SC 29202

A handwritten signature in cursive script, reading "Erin Bridges", written in black ink.

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Erin Bridges

October 26, 2017

October 26, 2017

VIA HAND DELIVERY

The Honorable Daniel E. Shearouse  
Clerk of Court  
Supreme Court of South Carolina  
Post Office Box 11330  
Columbia, South Carolina 29211

**RECEIVED**

OCT 26 2017

S.C. SUPREME COURT

RE: McGuinn Construction v. Saul Espino  
Case Tracking No.: 2016-001291

Dear Mr. Shearouse:

Please find enclosed for filing the original and seven (7) copies of a Motion for Extension in the above referenced matter. I have also enclosed a proof of service of this document on counsel for the Respondents and a \$25.00 check for filing this motion. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Erin Bridges  
Paralegal to Blake A. Hewitt  
BLUESTEIN THOMPSON SULLIVAN, LLC

/emb

Enclosures

cc: Andrew A. Aun, Esquire  
S. Jahue Moore, Esquire  
Andrew F. Lindemann, Esquire



# The Supreme Court of South Carolina

Blake A. Hewitt  
PO Box 7965  
Columbia SC 29202

10/26/2017

## RECEIPT #84952

**Case No:** 2016-001291  
**Case Short Title:** McGuinn Construction v. Saul Espino  
**Event:** Motion - Extension of Time (1st)  
**Fee Type:** Motion Fee  
**Amount:** \$25.00  
**Payment Type:** Check  
**Reference No:** 8603  
**Check/Money Order Date:** 10/26/2017  
**Comments:**