

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED

Deadra L. Jefferson, Circuit Court Judge

NOV 03 2017

SC Court of Appeals

Case No. 2013-CP-10-03326
Appellate Case No. 2017-000474

Ex Parte: Liberty Mutual Fire Insurance Company,..... Appellant.

v.

In re: Waverly at Hamlin Plantation Townhome
Association, Inc., Respondent,

v.

John Wieland Homes and Neighborhoods of the
Carolinas, Inc. as successor by statutory merger to John
Wieland Homes and Neighborhoods of South Carolina,
Inc., John Wieland Homes of Charleston, Inc., John
Wieland Homes, Inc., Builders Support Services of the
Carolinas, Inc. and Wheelock Street Capital, LLC d/b/a
John Wieland Homes and Neighborhoods, Inc., Respondents,

and

John Wieland Homes and Neighborhoods of the
Carolinas, Inc., as successor by statutory merger to John
Wieland Homes and Neighborhoods of South Carolina,
Inc., John Wieland Homes of Charleston, Inc., John
Wieland Homes Inc., Builders Support Services of the
Carolinas, Inc. Respondents,

v.

Barr Construction, Inc., Benjamin Mora d/b/a Mora
Construction, a/k/a Benjamin Mora Construction, LLC,
Builders FirstSource, Inc., a/k/a Builders FirstSource-
Southeast Group, LLC, a/k/a Builders FirstSource-
Atlantic Group, LLC, DBC Construction Services, LLC,
Eli, Inc., Gerardo Rosette Sanchez a/k/a GR Painting,
Jorge Medina, Jorge Medina a/k/a JMC Construction,
LLC a/k/a JMC Construction, Inc., Jesus Mora a/k/a J.
Mora Brick & Block Mason, LLC, Juan Luis Sanchez,
Juan Luis Sanchez a/k/a Sanchez Brothers Painting,



Latitude Construction Services, LLC, The Muhler
Company, Inc., Paul M. Vasquez, Richard Ditullio,
Richard Ditullio a/k/a RDT Contracting, LLC,

Respondents.

MOTION FOR AN EXTENSION OF TIME

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellant Liberty Mutual Fire Insurance Company (“Appellant”) respectfully requests a ten (10) day extension of time to file the Initial Reply Brief of Appellant and Designation of Matter in the above-captioned appeal. This is the second request for an extension of this deadline. The Court previously extended the original deadline by ten days.

This request is necessitated due to undersigned counsel’s numerous other work conflicts, scheduling deadlines, and other court appearances/filings. Currently, Appellant’s Initial Reply Brief and Designation of Matter are due on November 6, 2017. Appellant requests a ten (10) day extension of time until November 16, 2017.

Therefore, Appellant requests that this Court enter an order extending the deadline for the Initial Reply Brief of Appellant and Designation of Matter until November 16, 2017. Appellant requests that the current deadline be held in abeyance while the Court considers this request.

Signature on Following Page

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: Blake T. Williams

C. Mitchell Brown

SC Bar No. 12872

Brian P. Crotty

SC Bar No. 16983

Blake T. Williams

SC Bar No. 100794

NELSON MULLINS RILEY & SCARBOROUGH LLP

1320 Main Street/17th Floor

Columbia, SC 29211

(803) 799-2000

Robert C. Calamari

SC Bar No. 064985

NELSON MULLINS RILEY & SCARBOROUGH LLP

3751 Robert M. Grissom Parkway, Suite 300

Myrtle Beach, SC 29577

(843) 448-3500

*Attorneys for Appellant Liberty Mutual Fire Insurance
Company*

Columbia, South Carolina

November 3, 2017

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and

John Wieland Homes and Neighborhoods of the
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Atlantic Group, LLC, DBC Construction Services, LLC,
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Jorge Medina, Jorge Medina a/k/a JMC Construction,
LLC a/k/a JMC Construction, Inc., Jesus Mora a/k/a J.
Mora Brick & Block Mason, LLC, Juan Luis Sanchez,
Juan Luis Sanchez a/k/a Sanchez Brothers Painting,
Latitude Construction Services, LLC, The Muhler

Company, Inc., Paul M. Vasquez, Richard Ditullio,
Richard Ditullio a/k/a RDT Contracting, LLC,

Respondents.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Liberty Mutual Fire Insurance Company, do hereby certify that I have served all counsel in this action with copies of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **Motion for an Extension of Time**

Counsel Served: *Attorneys for Waverly @ Hamlin Plantation Townhome Association, Inc.*

U.S. Mail

John C. Hayes, IV, Esquire
Mary-Margaret Fitzhenry Noland, Esquire
HAYES LAW FIRM LLC
180 Meeting Street, Suite 330
Charleston, SC 29401

U.S. Mail

Ivon Keith McCarty, Esquire
MCCARTY LAW FIRM, PC
Post Office Box 30055
Charleston, SC 29417

U.S. Mail

Jesse Sanchez, Esquire
THE LAW OFFICE OF JESSE SANCHEZ
98½ Broad Street, Suite B
Charleston, SC 29401

Attorneys for AC Construction Inc.

U.S. Mail

Caroline Coward McIntosh, Esquire
Kevin W. Mims, Esquire
LUZURIAGA MIMS, LLP
50 Immigration Street, Suite 200
Charleston, SC 29403

Attorneys for Barr Construction Inc.

U.S. Mail

Erin DuBose Dean, Esquire
TUPPER GRIMSLEY & DEAN, PA
Post Office Box 2055
Beaufort, SC 29901-2055

Attorneys for Benjamin Mora Construction LLC, Benjamin Mora, Mora Construction

U.S. Mail

Jonathan J. Anderson, Esquire
Curtis Brent Martin, Esquire
ANDERSON REYNOLDS & STEPHENS, LLC
Post Office Box 87
Charleston, SC 29402

Attorneys for Builder Support Services of the Carolinas, Inc., John Wieland Homes and Neighborhoods of South Carolina, Inc., John Wieland Homes and Neighborhoods of the Carolinas, Inc., John Wieland Homes Inc., John Wieland Homes of Charleston, Inc.

U.S. Mail

Christy Ford Allen, Esquire
John A. Massalon, Esquire
WILLS MASSALON & ALLEN LLC
Post Office Box 859
Charleston, SC 29402

U.S. Mail

Andrew Elliott Haselden, Esquire
Justin Paul Novak, Esquire
HOWSER NEWMAN & BESLEY, LLC
215 East Bay Street, Suite 303
Charleston, SC 29401

U.S. Mail

Theodore Luke Manos, Esquire
ROBERTSON HOLLINGSWORTH & FLYNN
177 Meeting Street, Suite 300
Charleston, SC 29401

*Attorneys for John Wieland Homes and Neighborhoods Inc.,
Wheelock Street Capital LLC*

U.S. Mail

Marvin D. Infinger, Esquire
Cheryl D. Shoun, Esquire
NEXSEN PRUET, LLC
Post Office Box 486
Charleston, SC 29402

*Attorneys for JMC Construction, Inc., JMC Construction, LLC,
Jorge Medina*

U.S. Mail

Christopher M. Adams, Esquire
Andrew N. Cole, Esquire
COLLINS & LACY, PC
Post Office Box 12487
Columbia, SC 29211

Attorneys for Juan Luis Sanchez, Sanchez Brothers Painting

U.S. Mail

Julian Kane Allen, Esquire
ALLEN LAW
Post Office Box 12429
Charleston, SC 29422

U.S. Mail

Sarah Louise Fragale, Esquire
TURNER PADGET GRAHAM & LANEY, PA
40 Calhoun Street, Suite 200
Charleston, SC 29401

Attorneys for Builders Firstsource Southeast Group LLC

U.S. Mail

Stephen P. Hughes, Esquire
HOWELL GIBSON & HUGHES, PA
Post Office Box 40
Beaufort, SC 29901

U.S. Mail

James Andrew Yoho, Esquire
CARLOCK COPELAND & STAIR, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29407

Attorneys for Richard Ditullio and RDT Contracting LLC

U.S. Mail

Jared Hudson Garraux, Esquire
RICHARDSON PLOWDEN & ROBINSON, PA
1900 Barnwell Street
Columbia, SC 29201

Attorneys for Eli Inc.

U.S. Mail

Patrick T. Morrissey, Esquire
CLAWSON & STAUBES, LLC
127 Seven Farms Drive, Suite 200
Charleston, SC 29492-7595

Attorneys for Latitude Construction Services LLC

U.S. Mail

Robert Michael Ethridge, Esquire
Laura Elizabeth Paris Paton, Esquire
CARLOCK COPELAND & STAIR, LLP
Post Office Box 20969
Charleston, SC 29413

Attorneys for J Mora Brick & Block Mason LLC, Jesus Mora

U.S. Mail

Elizabeth Fraysure Fulton, Esquire
PRITCHARD LAW GROUP LLC
129 Broad Street
Charleston, SC 29401

U.S. Mail

John Elliott Rogers, II, Esquire
Carl Reed Teague, Esquire
THE WARD LAW FIRM, P.A.
Post Office Box 5663
Spartanburg, SC 29304

Attorneys for The Muhler Company Inc


U.S. Mail

Peter Gunnar Nistad, Esquire
GALLIVAN WHITE & BOYD, PA
Post Office Box 22768
Charleston, SC 29413

Pro Se

U.S. Mail

Mr. Paul M. Vasquez
1417 Peach Blossom Lane
Charleston, SC 29492-8263



Kelsey Dreyer
Administrative Assistant

November 3, 2017



NELSON MULLINS

Blake T. Williams
T 803.255.9597 F 803.255.9032
blake.williams@nelsonmullins.com

NELSON MULLINS RILEY & SCARBOROUGH LLP
ATTORNEYS AND COUNSELORS AT LAW

1320 Main Street | 17th Floor
Columbia, SC 29201
T 803.799.2000 F 803.256.7500
nelsonmullins.com

November 3, 2017

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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RE: Waverly at Hamlin Plantation Townhome Association, Inc. v. John
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Civil Action No. 2013-CP-10-03326
Appellate Case No. 2017-000474
NMRS File No. 00350.01785

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven copies of a Motion for an Extension of Time, along with a check for the filing fee. Please return a clocked-in copy to us via our courier.

By copy of this letter, we are serving all counsel with this document.

Very truly yours,

A handwritten signature in cursive script that reads "Blake T. Williams".

Blake T. Williams

BTW:kd
Enclosures

cc: John C. Hayes, IV, Esquire
Mary-Margaret Fitzhenry Noland, Esquire
Ivon Keith McCarty, Esquire
Jesse Sanchez, Esquire
Caroline Coward McIntosh, Esquire
Kevin W. Mims, Esquire
Erin DuBose Dean, Esquire
Jonathan J. Anderson, Esquire
Curtis Brent Martin, Esquire
Christy Ford Allen, Esquire
Andrew Elliott Haselden, Esquire
Justin Paul Novak, Esquire
Theodore Luke Manos, Esquire
Marvin D. Infinger, Esquire
Cheryl D. Shoun, Esquire
Christopher M. Adams, Esquire
Andrew N. Cole, Esquire
Julian Kane Allen, Esquire
Sarah Louise Fragale, Esquire
Stephen P. Hughes, Esquire
James Andrew Yoho, Esquire
Jared Hudson Garraux, Esquire
Patrick T. Morrissey, Esquire
Robert Michael Ethridge, Esquire
Laura Elizabeth Paris Paton, Esquire
Elizabeth Fraysure Fulton, Esquire
John Elliott Rogers II, Esquire
Carl Reed Teague, Esquire
Peter Gunnar Nistad, Esquire
Mr. Paul M. Vasquez

LAW OFFICES
NELSON, MULLINS, RILEY & SCARBOROUGH, L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP

POST OFFICE BOX 11070
COLUMBIA, SOUTH CAROLINA 29211-1070

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