

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Cynthia Graham Howe, Master-in-Equity, Fifteenth Judicial Circuit

Case No. 2009-CP-26-620  
Appellate Case No. 2016-001075

**RECEIVED**  
AUG 08 2018  
SC Court of Appeals

Ellis E. Smith, individually and on behalf of A & E Constructors and Consultants, Inc., a South Carolina Corporation.....Plaintiffs,

v.

Arthur Wayne Vereen, Park Place Properties of Myrtle Beach, LLC, Parkway Offices, LLC, Arthur Vereen Construction, Inc., Linda C. Vereen, Arthur W. Vereen, as Trustee of the Arthur W. Vereen Residence Trust, and Linda C. Vereen, as Trustee of the Linda C. Vereen Residence Trust,.....Defendants,

AND

Arthur Wayne Vereen, individually and on behalf of A & E Constructors and Consultants, Inc., and 29<sup>th</sup> Place Developers, Inc.,.....Third-Party Plaintiffs,

v.

E. Smith and Sons Construction, LLC, EES Construction and Consulting, Inc., and Ellis E. Smith, individually.....Third-Party Defendants,

OF WHOM Arthur Wayne Vereen, individually and on behalf of A & E Constructors and Consultants, Inc., Park Place Properties of Myrtle Beach, LLC, Parkway Offices, LLC, Arthur Vereen Construction Company, Inc., Linda C. Vereen, Arthur Wayne Vereen, as Trustee of the Arthur W. Vereen Residence Trust, Linda C. Vereen, as Trustee of the Linda C. Vereen Residence Trust, and 29<sup>th</sup> Place Developers, Inc. are Appellants,

AND

Ellis E. Smith, individually and on behalf of A & E Constructors and Consultants, Inc., a South Carolina Corporation and E. Smith and Sons Construction, LLC, EES Construction and Consulting, Inc., and Ellis E. Smith, individually are Respondents.

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JOINT MOTION FOR EXTENSION OF TIME and MOTION FOR EXPANDED  
PAGE LIMITS

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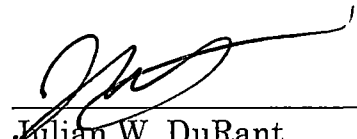
Respondents Ellis Smith, individually and on behalf of A&E Constructors and Consultants, Inc., E. Smith and Sons Construction, LLC, and EES Construction and Consulting, Inc. jointly move for an extension of time to serve their Initial Brief(s) and Designation(s) of Matter to be Included in the Record of Appeal. This motion is based on the voluminous nature of the record, scheduling conflicts on the undersigned, and the complexity of the case. Respondents have received one previous extension of time to August 22, 2018. *See* July 9, 2018 Order. In this Motion, Respondents ask for an extension to serve and file those materials on or before Friday, September 21, 2018.

Respondents Ellis Smith, individually and on behalf of A&E Constructors and Consultants, Inc., move for order granting them an additional fifteen pages for their brief (up to 65 pages) above the amount set forth in Appellate Rule 208(b)(5). For clarity's sake, this motion relates to a single brief. Additional pages are needed to adequately explain the factual background of this case—three-plus-years' worth of transactions—and to contest the issues raised by Appellants.

Counsel for Appellants consents to these Motions.

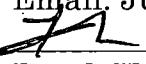
WHEREFORE, Respondents respectfully move for an order granting (i) a thirty (30) day extension of time for the filing of their Initial Brief(s) and Designation(s) and (ii) an additional fifteen pages in their brief.

Respectfully submitted on August 7, 2018.



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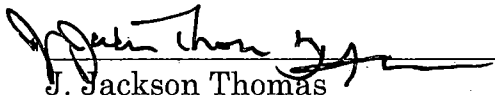
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*Attorney for Respondents E. Smith and Sons Construction, LLC, EES Construction and Consulting Inc., and Ellis E. Smith, individually*

**CERTIFICATE OF SERVICE**

I, Kim Moore, am an employee of DuRant & DuRant, P.A. and certify that I have served all counsel of record a copy of this **JOINT MOTION FOR EXTENSION OF TIME and MOTION FOR EXPANDED PAGE LIMITS** by depositing a copy in the United States Mail, first class postage pre-paid, on August 7, 2018:

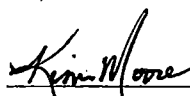
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**SC Court of Appeals**



\_\_\_\_\_  
Kim Moore

Dated: August 7, 2018

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August 7, 2018

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

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SC Court of Appeals

RE: Appellate Case No. 2016-001075  
Ellis Smith v. Arthur Vereen, et al.


Ms. Kitchings:

Enclosed for filing is an original and seven copies of Respondents' Joint Motion for Extension of Time and A&E's Motion for Expanded Page Limits. I've enclosed the certificate of service for these motions along with the filing fee of \$25.00.

Please return one filed copy of the Motion for Extension of Time and Motion for Expanded Page Limits, certificates of service in the enclosed self-addressed, stamped envelope.

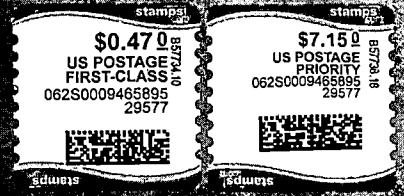
Sincerely,

DURANT & DURANT, P.A.

  
\_\_\_\_\_  
Julian W. DuRant  
S.C. Bar No. 102420

CC: Henrietta U. Golding, Esquire  
James K. Gilliam, Esquire  
J. Jackson Thomas, Esquire

✓



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