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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

Case No. 2018-CP-10-02152  
Appellate Case No. 2019-000562

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AUG 05 2019  
SC Court of Appeals

Six Fifty Six Owners Association, Inc. and Robert John Nutley, individually, and on behalf of all others similarly situated, Respondents,

v.

WCB, LLC; 656 Coleman, LLC; and The Ryland Group, Inc., Defendants,

Of which The Ryland Group, Inc. is the Appellant.

**RESPONDENTS' MOTION FOR EXTENSION**

COMES NOW Respondents, Six Fifty Six Owners Association, Inc. and Robert John Nutley, individually, and on behalf of all others similarly situated, pursuant to Rule 240 of the *South Carolina Appellate Court Rules*, and respectfully request this Court of Appeals grant them a thirty-day (30) extension of time in which to file Respondents' Initial Brief and Designation of Matter to be Included in the Record on Appeal (the "DOM") in this appellate matter. The basis for this motion that lead counsel is out of the country on family vacation; one associate was out on maternity leave; counsel has had a full calendar of other client/court obligations; and counsel has had other deadlines before this Honorable Court.

Based upon the current briefing schedule, Respondents' Initial Brief and DOM are currently due on or before Monday, August 5, 2019. Consequently, anticipating a favorable

reception and subsequent grant of this extension motion, Respondents' Initial Brief and DOM would then be due on or before Wednesday, September 4, 2019.

Finally, Respondents' respectfully request this Court of Appeals hold the briefing time in abeyance until such time as this motion may be considered and ruled upon. This is Respondents' first extension request. Respondents' counsel has conferred with and obtained the consent of Appellants' counsel.

JUSTIN O'TOOLE LUCEY, P.A.

By: \_\_\_\_\_

Justin O'Toole Lucey

Dabny Lynn

Joshua F. Evans

415 Mill Street

Mount Pleasant, SC 29464

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*Attorneys for Respondent.*

Mount Pleasant, SC

August 2, 2010

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PROOF OF SERVICE

I certify that I have served Respondents' Motion for Extension on Appellants by depositing a copy of it in the United States Mail, postage prepaid, on August 2, 2019 addressed to their attorneys of record as follows:

James Lynn Werner, Esq.  
Katon E. Dawson, Jr., Esq.  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Columbia, SC 29201

*Attorneys for Appellant The Ryland Group, Inc.*

JUSTIN O'TOOLE LUCEY, P.A.

By: \_\_\_\_\_

Dabny Lynn  
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*Attorneys for Respondent.*

Mount Pleasant, SC  
August 2, 2019

# JUSTIN O'TOOLE LUCEY, PA

*Attorneys at Law*

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Dabny Lynn  
James L. Floyd, III

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Anna S. McCann  
Lauren M. Milton  
Sohayla R. Townes  
Collin H. Fuller

August 2, 2019

**VIA OVERNIGHT MAIL**

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

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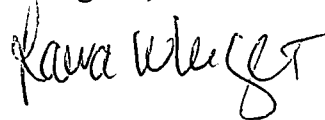
**Re: Six Fifty Six Owners Association, Inc., et al v. WCB, LLC, et al**  
**Appellate Case No. 2019-000562**

Dear Mrs. Kitchings:

Enclosed please find the original and seven copies of a *Motion for Extension of Time in Which to File Initial Brief and DOM* in the above referenced consolidated appellate matters. I also enclose a *Proof of Service* indicating service of the *Motion for Extension of Time in Which to File Initial Brief and DOM* and the *Proof of Service* upon counsel for the Appellant. Finally, I enclose our firm check in the amount of \$50.00 as payment for the filing fee. I would greatly appreciate you filing the *Motion for Extension of Time in Which to File Initial Brief and DOM* and the *Proof of Service* with the Court of Appeals and returning a date stamped copy of each to my attention in the enclosed self-addressed, stamped envelope.

If you need anything else or I otherwise may be of any assistance to you or to the Court of Appeals regarding this matter, please feel free to contact me.

Best regards,



Laura W. Knight

ORIGIN ID:RBWA (843) 849-8941  
LAURA KNIGHT

415 MILL STREET

MOUNT PLEASANT, SC 29464  
UNITED STATES US

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SOUTH CAROLINA COURT OF APPEAL  
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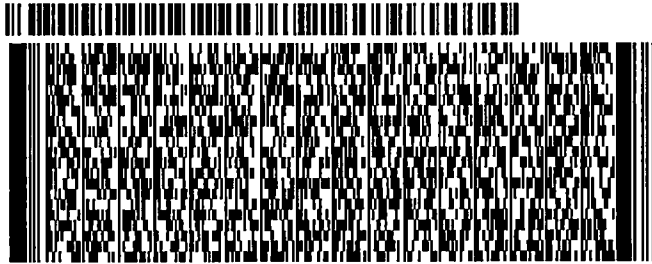
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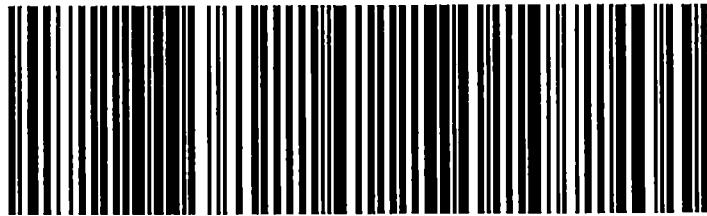
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SC Court of Appeals

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