

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

Alexander S. Macaulay, Presiding Judge Seventh Judicial Circuit

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Appellate Case No. 2019-000038  
Lower Court Case No. 2009-CP-37-00652

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**RECEIVED**

AUG 23 2019

**SC Court of Appeals**

Stoneledge at Lake Keowee Owners' Association, Inc.; C. Dan Carson; Jeffrey J. Dauler; Joan W. Davenport; Michael Furnari; Donna Furnari; Jessie B. Grasso; Nancy E. Grasso; Robert P. Hayes; Lucy H. Hayes; Ty Hix; Jennifer D. Hix; Paul W. Hund, III; Ruth E. Isaac; Michael D. Plourde; Mary Lou Plourde; Carol C. Pope; Steven B. Taylor; Bette J. Taylor; and Robert White, Individually and on Behalf of all others similarly situated, Petitioners-Respondents,

v.

IMK Development Co., LLC; Keowee Townhouses, LLC; Ludwig Corporation, LLC; SDI Funding, LLC; Medallion at Keowee, LLC; Integrys Keowee Development, LLC; Marick Home Builders, LLC; Bostic Brothers Construction, Inc.; Miller/Player & Associates; Bradford D. Seckinger; John Ludwig; William Cox; Larry D. Lollis; Rick Thoennes; M Group Construction and Development, LLC; Mel Morris; Joe Bostic; Jeff Bostic; Clear View Construction, LLC; Michael Franz; MHC Contractors; Miguel Porras Choncoas; Builders First Source-Southeast Group; Mike Green; Southern Concrete Specialties; Carl Compton d/b/a Compton Enterprise a/k/a Compton Enterprises; Gunter Heating & Air; All Pro Heating; A/C & Refrigeration, LLC; Coleman Waterproofing; Heyward Electrical Services, Inc.; Tinsley Electrical, LLC; Hutch N Son Construction, Inc.; Upstate Utilities, Inc.; Southern Basements; Carl Catoe Construction, Inc.; T.G. Construction, LLC; Delfino Construction; Francisco Javier Zarate d/b/a Zarate Construction; Alejandro Avalos Cruz; Heriberto Acros Hernandez; Martin Hernandez-Aviles; Francisco Villalobos Lopez; Ambrosio Martinez-Ramirez; Ester Moran Mentado; Socorro Castillo Montel; MJG Construction and Homebuilders, Inc. d/b/a MJG Construction; KMAC of the Carolinas, Inc.; Eufacio Garcia; Everado Jarmamillio; Garcia Parra Insulation, Inc.; J&J Construction; Jose Nino; Jose Manuel Garcia; Eason Construction, Inc.; Vincent Morales d/b/a Morales Masonry and Miller/Player & Associates, Defendants,

Of Which Marick Home Builders, LLC and Rick Thoennes are the Respondents-Petitioners,

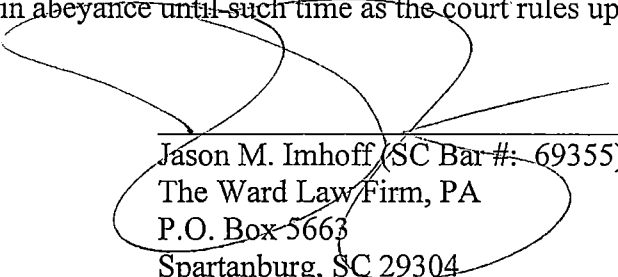
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**MOTION FOR EXTENSION OF TIME**

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Pursuant to Rule 263 of South Carolina Appellate Court Rules, the Appellants, Marick Home Builders, LLC and Rick Thoennes, hereby move for an extension of time in which to file the Appeal.

The Appellants ask that the Court grant this extension to October 5, 2019 and the deadline for this request be held in abeyance until such time as the court rules upon this Motion.



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Jason M. Imhoff (SC Bar #: 69355)  
The Ward Law Firm, PA  
P.O. Box 5663  
Spartanburg, SC 29304  
Office: (864) 582-3075  
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*Attorneys for Respondents-Petitioners Marick  
Home Builders, LLC and Rick Thoennes*

August 15, 2019

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM OCONEE COUNTY  
Court of Common Pleas

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Appellate Case No. 2019-000038  
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v.

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Of Which Marick Home Builders, LLC and Rick Thoennes are the Respondents-Petitioners,

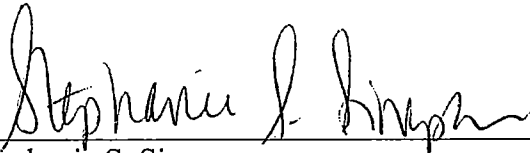
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**PROOF OF SERVICE**

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SC Court of Appeals

I certify that I have served the Motion for Extension of Time by depositing a copy of it in the United States Mail, First Class postage prepaid, on August 21, 2019, addressed to Respondents' attorneys of record, Robert T. Lyles, Jr., Esquire, Lyles & Lyles, LLC, P.O. Box 773, Charleston, SC 29401 (attorney for Petitioners-Respondents).

  
Stephanie S. Simpson  
Paralegal to Jason M. Imhoff

August 21, 2019

PETITIONERS-RESPONDENTS' COUNSEL OF RECORD:

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*Attorneys for Petitioners-Respondents*

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AUG 23 2019

**SC Court of Appeals**

E-mail: jimhoff@wardfirm.com  
Direct No. 582-3075

August 15, 2019

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

**Re: *Stoneledge at Lake Keowee Owners' Association, Inc., et al. vs. IMK  
Development Co., LLC, et al. vs. Michael Franz, et al.***  
**Appellate Case No: 2015-000392**

Dear Mr. Shearhouse,

Enclosed for filing is the original and seven (7) copies of Respondents-Petitioner's Motion for Extension of Time to file the Record on Appeal. The current deadline is September 5, 2019.

The new deadline for Respondents-Petitioners to file the Record on Appeal will be October 5, 2019 if extension of time is granted. This request for an extension of time is warranted and has not been interposed to delay the case.

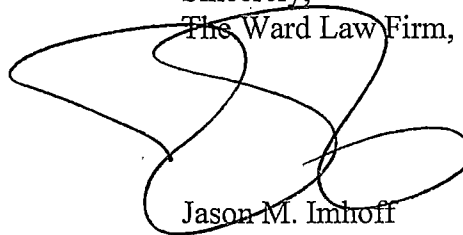
Also enclosed is our firm check in the amount of \$25.00 to cover the filing fee for the motion and the original and one copy of the Proof of Service upon opposing counsel.

Please file-stamp and return the extra copies in the envelope provided for your convenience. Opposing counsel is being served the same by copy of this letter.

Thank you for your time and consideration.

The Honorable Daniel E. Shearhouse  
Clerk, Supreme Court of South Carolina  
August 15, 2019  
Page 2

Sincerely,  
The Ward Law Firm, PA

A large, stylized handwritten signature in black ink, appearing to be 'JMI', written over the typed name.

Jason M. Imhoff  
*Attorneys for Respondents-Petitioners*

JMI/sss  
Enclosures

cc(w/encl.): The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals

Robert T. Lyles, Jr.  
Attorney for Petitioners-Respondents

Jason M. Imhoff, Esquire  
The Ward Law Firm  
P.O. Box 5663  
Spartanburg, SC 29304

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AUG 23 2019

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
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