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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Henry W. Brown  
Special Referee

**RECEIVED**  
AUG 23 2019  
SC Court of Appeals

APPELLATE CASE NO.: 2019-000513

Brown Contractors, LLC under S.C. Residential Builders License No. 20378,  
.....Appellant/Respondent,

v.

Andrew Joseph McMarlin a/k/a Andrew Joseph McMarlin and Amy Salzhauer,  
.....Respondents/Appellants,

And

Andrew McMarlin and Amy Salzhauer,  
.....Respondents/Appellants,

v.

James Brown IV and Brown-Meihaus Construction, LLC,  
.....Third-Party Defendants.

**APPELLANT/RESPONDENT'S MOTION FOR SECOND EXTENSION  
TO FILE INITIAL CROSS-APPEAL BRIEF**

COMES NOW THE Appellant/Respondent, Brown Contractors, LLC, who moves  
this Honorable Court for a second thirty (30) day extension on filing the *Initial Cross-  
Appeal Brief*, due to time constraints.



Robert B. Varnado (SC Bar # 0007085)  
BROWN & VARNADO LLC  
P.O. Box 1127  
Mount Pleasant, South Carolina 29465  
(843) 737-7300  
*Attorneys for Appellant/Respondent and  
Third-Party Defendants.*

August 21, 2019  
Mt. Pleasant, South Carolina

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.....Third-Party Defendants.

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**CERTIFICATE OF SERVICE**

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The undersigned attorney hereby certifies that a true copy of the *Appellant/Respondent's Motion for Second Extension to File Initial Cross-Appeal Brief* in the above referenced case has been served upon counsel of record by mailing a copy in an envelope properly addressed with postage prepaid on this date to the following:

Robert T. Lyles, Jr., Esquire  
Lyles & Associates, LLC  
342 East Bay Street  
Charleston, South Carolina 29401

(Signature on Following Page)



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Attorneys for Appellant/Respondent and  
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August 21, 2019  
Mt. Pleasant, South Carolina

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ROBERT B. VARNADO  
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August 21, 2019

VIA U.S. MAIL AND FAX

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

**RECEIVED**  
AUG 23 2019  
SC Court of Appeals

**Re: *Brown Contractors, LLC v. Andrew McMarlin***  
Appellate Case No.: 2019-0053  
Our File No.: 6225.005

Dear Ms. Kitchings:

Attached please find a motion for a second thirty (30) day extension to file Appellant/  
Respondent Brown Contractor, et al's response to the ***Initial Cross-Appeal Brief of Respondents***.  
Enclosed is my check for \$50.00.

If you have any questions, please do not hesitate to call. Thank you.

With best regards, I remain

Very truly yours,

BROWN AND VARNADO LLC



Robert B. Varnado

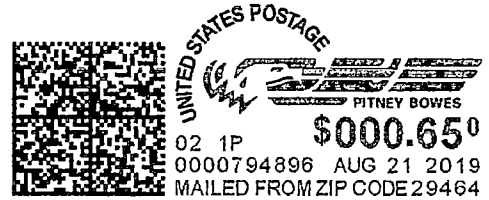
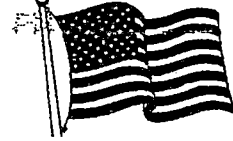
RBV

cc: Robert T. Lyles, Jr., Esquire (*Via email and US Mail*)

CHARLES JON

SC 294

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Brown & Varnado, LLC  
P.O. Box 1127  
Mount Pleasant, SC 29465

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Hon. Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
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Columbia, SC 29201



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