

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Apr 27 2020

SC Court of Appeals

APPEAL FROM HORRY COUNTY
William H. Seals, Jr., Circuit Court Judge

Appellate Case No. 2019-002001
Trial Court Case No. 2015-CP-26-07275

BEI-Beach, LLC, Plaintiff,

v.

Mashburn Christman, JV, Lend Lease (US) Construction, Inc., f/k/a
Bovis Lend Lease, Inc., and McCrory Construction Company, LLC,
..... Defendants,

Mashburn Christman, JV, Third-Party Plaintiff,

v.

Wallcraft Construction, Inc.; Alpha Insulation & Waterproofing,
Inc.; Baker Roofing, Inc.; Collins & Wright, Inc.; Liberty Mutual
Insurance Company; Old Republic Surety Company; Hartford Fire
Insurance Co.; Travelers Casualty and Surety Company of America;
The Muhler Company, Inc., and Companion Property and Casualty
Insurance Company, Third-Party Defendants,

Lend Lease (US) Construction, Inc., f/k/a Bovis Lend Lease, Inc., Third-Party Plaintiff,

v.

Spann Roofing & Sheet Metal, Inc.; Travelers Casualty and Surety
Company of America; Strickland Waterproofing Company;
Merchants Bonding Company; Everest Reinsurance Company;
Wallcraft Construction, Inc., Old Republic Insurance Company;
Madison Construction Group, Inc.; Worthington Integrated
Building Systems; McDowell Commercial Construction, LLC;
Jolley Masonry; National Fire Insurance Company of Hartford; R.J.
Kenney Associates, Inc.; Antunovich Associates, Inc.; TG
Construction, LLC; Luis Trim Work; Nora Del Carmen Laos, Nora
Del Carmon Lagos d/b/a Luis Trim Work; and Ovation Custom
Trim, LLC, Third-Party Defendants,

McCrary Construction Company, LLC, Third-Party Plaintiff,

v.

Collins & Wright; Baker Roofing; Glasstech Inc.; Palmetto State Roofing and Sheet Metal; Strickland Waterproofing; Maiday, Inc.; and Atlas Drywall & Acoustics, Inc., Third Party Defendants,

Spann Roofing & Sheet Metal, Inc., Fourth-Party Plaintiff,

v.

Coastal Commercial Roofing Co., Inc., and Daniel Kniffen d/b/a East Coast Improvements, Fourth-Party Defendants,

Wallcraft Construction, Inc., Fourth-Party Plaintiff,

v.

Vienamin Petresku d/b/a BT Construction, LLC, Fourth-Party Defendant,

of which Lend Lease (US) Construction Inc., f/k/a Bovis Lend Lease, Inc., is the Appellant,

and

Antunovich Associates, Inc., is the Respondent.

MOTION FOR EXTENSION OF TIME

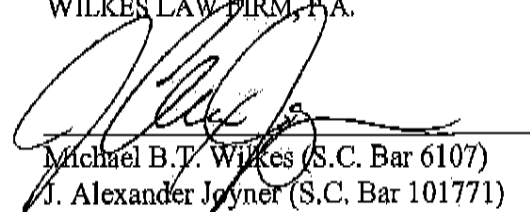
Respondent respectfully moves this Court for an Order pursuant to Rule 263(b), SCACR, for a fifteen (15) day extension of time in which to file and serve its Final Brief, which at present is due on April 27, 2020. This motion is not made for the purpose of undue delay, and is the first request for an extension of time.

Counsel seeks additional time due to unexpected logistical difficulties, including those resulting from the COVID-19 pandemic and workloads in other matters.

Counsel for Appellant has consented to this motion for an extension of time. With the requested extension, Respondent's Final Brief would be due Tuesday, May 12, 2020.

April 27, 2020

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Attorneys for Respondent

Other Counsel of Record:

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- AND -

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Attorneys for Appellants

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Wallcraft Construction, Inc.; Alpha Insulation & Waterproofing,
Inc.; Baker Roofing, Inc.; Collins & Wright, Inc.; Liberty Mutual
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America; The Muhler Company, Inc., and Companion Property
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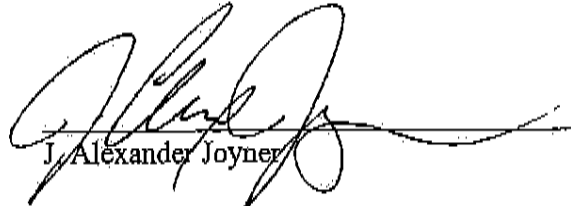
PROOF OF SERVICE

I certify that I have served the *Motion for Extension* on the following counsel of record
by depositing a copy of it in the United States Mail, postage prepaid, on **April 27, 2020**.

James A. Bruorton, IV, Esq.
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Attorneys for Appellants



J. Alexander Joyner

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W. SPENCER BARROW

- *CHARLESTON OFFICE
- *ALSO MEMBER GEORGIA BAR
- *ALSO MEMBER NORTH CAROLINA BAR
- *CERTIFIED MEDIATOR

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SC Court of Appeals

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April 27, 2020

Via Fax Only

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
Fax : 803-734-1839

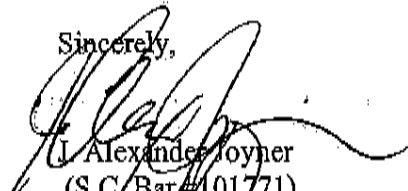
Re: *BEI-Beach, LLC v Mashburn Christman, LLC, et al.*
In the Court of Appeals for the State of South Carolina
Appellate Case No. 2019-002001

Dear Ms. Kitchings:

Enclosed for filing in the referenced matter an original and one copy of the *Motion for Extension of Time* and *Proof of Service*. Please file the original and return filed copies to us.

If you have any questions, please advise.

Sincerely,


J. Alexander Joyner
(S.C. Bar #101771)
ajoyner@wilkeslaw.com

JAJ:mkc
Enclosures

- cc: Michael Wilkes, Esq. (via email only)
- James A. Bruorton, IV, Esq. (via email only)
- Elizabeth F. Nicholson, Esq. (via email only)
- F. Heyward Grimboll, Esq. (via email only)

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FACSIMILE COVER SHEET

DATE: 4-27-20

PAGES: 8 (Including this cover sheet)

TO: SC Court of Appeals

FAX NO.: 1-803-734-1839

FROM: J. Alexander Joyner , Esq.

MESSAGE:

Re: *BEI Beach, LLC, LLC v. Mashburn Christman, LLC, et al*
Appellate Case No. 2019-002001
Motion for Extension of Time

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