

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Case No. 2015-CP-10-00955  
Appellate Case No. 2019-001520

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**RECEIVED**  
MAY 26 2020  
SC Court of Appeals

Palmetto Pointe at Peas Island Condominium Property  
Owners Association, Inc., and Jack Love, individually, and  
on behalf of all others similarly situated,

Appellants,

v.

Island Pointe, LLC, Complete Building Corporation, Tri-  
County Roofing, Inc., WC Services, Inc., Miracle Siding,  
LLC and Wilson Lucas Sales d/b/a Miracle Siding, LLC,  
Eloy Alonzo Vasquez, JMC Construction, Inc., and JMC  
Construction, LLC,

Defendants,

Of whom JMC Construction, Inc., JMC Construction, LLC,  
and WC Services, Inc. are the

Respondents.

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**MOTION FOR SECOND EXTENSION OF TIME  
TO FILE/SERVE INITIAL BRIEF OF APPELLANTS**

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Justin O. Lucey (SC Bar No. 15438)  
Joshua F. Evans (SC Bar No. 77448)  
Stephanie Drawdy (SC Bar No. 70205)  
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*Attorneys for Appellants*

Edward D. Buckley, Jr. (SC Bar No. 994)  
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25 Calhoun Street, Suite 400  
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P.O. Box 993 (29402)  
(843) 724-5446

*Attorneys for Appellants*

NOW COME Appellants, Palmetto Pointe at Peas Island Condominium Property Owners Association, Inc., and Jack Love, individually, and on behalf of all others similarly situated, by and through their undersigned counsel, on the grounds stated below, and, pursuant to Rule 263(b), SCACR, hereby move this Honorable Court for an extension of thirty (30) days' additional time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal.

1. Appellants received the last of the transcripts necessary for this appeal on March 24, 2020; consequently, Appellants initial briefing deadline was originally April 23, 2020, pursuant to Rule 208(a)(1), SCACR.

2. By order filed May 6, 2020, the Court extended Appellants' initial briefing deadline to May 26, 2020.

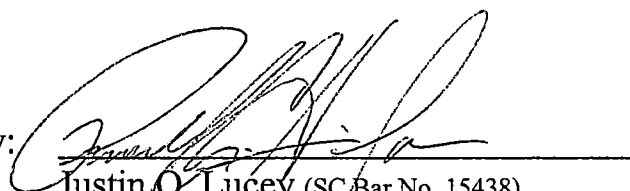
3. Because of other time commitments/disruptions (both work and non-work related, including those occasioned by the ongoing COVID-19 emergency), Appellants' counsel requests an extension of Appellants' current initial briefing deadline by thirty (30) days, i.e., an extension of the deadline through Thursday, June 25, 2020.

4. The undersigned respectfully submits that there is good cause to grant the requested relief, as it is consistent with the interests of justice and will not work any undue prejudice upon Respondents.

WHEREFORE, Appellants respectfully request that this Honorable Court extend their initial briefing/designation of matter deadline through Thursday, June 25, 2020. Further, Appellants respectfully request that the Court hold their present initial briefing/designation of matter deadline in abeyance until it acts upon this request.

Respectfully submitted,

By:



Justin O. Lucey (SC Bar No. 15438)

Joshua F. Evans (SC Bar No. 77448)

Stephanie Drawdy (SC Bar No. 70205)

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*and*

Edward D. Buckley, Jr. (SC Bar No. 994)

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(843) 724-5446

*Attorneys for Appellants*

Dated:

5/22/20

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Construction, LLC,

Defendants,

Of whom JMC Construction, Inc., JMC Construction, LLC,  
and WC Services, Inc. are the

Respondents.

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**PROOF OF SERVICE**

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Justin O. Lucey (SC Bar No. 15438)  
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*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, Palmetto Pointe at Peas Island Condominium Property Owners Association, Inc., and Jack Love, individually, and on behalf of all others similarly situated, certify that the **MOTION FOR SECOND EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this appeal on May 22, 2020, a copy thereof deposited in the U.S. Mail properly posted for delivery to the following addressees:

Andrew N. Cole, Esquire  
COLLINS & LACY, P.C.  
P.O. Box 12487  
Columbia, SC 29211

*Attorneys for Respondents  
JMC Construction, Inc.,  
and JMC Construction, LLC*

James A. Atkins, Esquire  
CLAWSON AND STAUBES, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

*Attorneys for Respondents  
WC Services, Inc.*

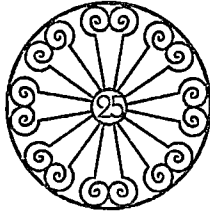
Respectfully submitted,

By: 

Russell G. Hines (SC Bar No. 72100)  
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*Attorneys for Appellants*

Dated: 5/22/20



# YCR LAW

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Project Assistant

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May 22, 2020

**VIA FACSIMILE & US MAIL**

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

**RECEIVED**  
MAY 26 2020  
SC Court of Appeals

Re: Palmetto Pointe at Peas Island Condominium Property Owners Association, Inc.  
and Jack Love, Individually, and on behalf of all others similarly situated v. JMC  
Construction, Inc., JMC Construction, LLC, and WC Services, Inc.  
Appellate Case No.: 2019-001520  
Case No.: 2015-CP-10-0955  
YCR File: 15491-20150066

Dear Ms. Kitchings:

Please find enclosed an original and one (1) copy of a Motion for Second Extension of Time to File/Serve Initial Brief of Appellants as well as the original and one (1) Proof of Service. Kindly return one (1) court stamped copy to us in the self-addressed envelope.

If additional copies or a filing fee are needed please let us know. With best wishes and kindest regards, I am

Sincerely,

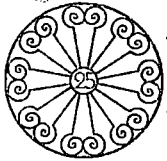
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc via e-mail & US mail: Andrew N. Cole, Esquire, Collins & Lacy, P.C.  
James A. Atkins, Esquire, Clawson & Staubes, LLC



**YCR LAW**  
Young Clement Rivers, LLP

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