

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

Appeal from Charleston County  
Court of Common Pleas

**RECEIVED**

Jennifer B. McCoy, Circuit Court Judge **Aug 05 2020**

**SC Court of Appeals**

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

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 WC Services, Inc. is the

Respondent.

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

Justin O. Lucey (SC Bar No. 15438)  
Joshua F. Evans (SC Bar No. 77448)  
Stephanie Drawdy (SC Bar No. 70205)  
JUSTIN O'TOOLE LUCEY, P.A.  
415 Mill Street  
Mt. Pleasant, South Carolina 29464  
P.O. Box 806 (29465)  
(843) 849-8400

*Attorneys for Appellants*

Edward D. Buckley, Jr. (SC Bar No. 994)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

*Attorneys for Appellants*

COME NOW 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, pursuant to Rule 263(b), SCACR, and move for an extension of ten (10) days' additional time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal.

Presently, in accordance with Rule 208(a)(3), the deadline for Appellants' initial reply brief and designation of matter is Thursday, August 6, 2019. On account of work-related and other time commitments, Appellants respectfully request that this deadline be extended by 10 days (from August 6, 2020), i.e., through August 17, 2020. Respectfully, Appellants believe that this relief is consistent with the interests of justice and will not work any undue prejudice upon Respondent.

WHEREFORE, Appellants move this Honorable Court to grant them an additional extension of 10 days' time to file/serve their initial reply brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial reply brief and designation of matter would be August 17, 2020, according to the undersigned's calculations. Further, Appellants respectfully request that the Court hold their present initial-briefing/designation-of-matter deadline in abeyance until it acts upon this motion.

*[Signature page for Motion for Extension of Time to File/Serve Initial Reply Brief  
of Appellants, Appellate Case No. 2019-001520]*

Respectfully submitted,

By: 

Justin O. Lucey (SC Bar No. 15438)  
Joshua F. Evans (SC Bar No. 77448)  
Stephanie Drawdy (SC Bar No. 70205)  
JUSTIN O'TOOLE LUCEY, P.A.  
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*and*

Edward D. Buckley, Jr. (SC Bar No. 994)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

*Attorneys for Appellants*

Dated: 8/5/20

**THE STATE OF SOUTH CAROLINA  
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Eloy Alonzo Vasquez, JMC Construction, Inc., and JMC  
Construction, LLC,

Defendants,

Of whom WC Services, Inc. is the

Respondent.

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**PROOF OF SERVICE**

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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)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

*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 EXTENSION OF TIME TO FILE/SERVE INITIAL REPLY BRIEF OF APPELLANTS** was served on all other parties to this appeal on August 5, 2020, a copy thereof deposited in the U.S. Mail properly posted for delivery to the following addressees:

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

*Attorneys for Respondents  
WC Services, Inc.*

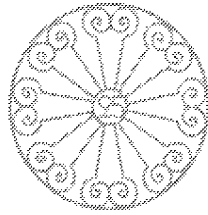
Respectfully submitted,

By: 

Russell G. Hines (SC Bar No. 72100)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

*Attorneys for Appellants*

Dated: 8/5/20



YCR LAW

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Project Assistant

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August 5, 2020

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**Aug 05 2020**

**SC Court of Appeals**

**VIA FACSIMILE**

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

Re: Palmetto Pointe at Peas Island Condominium Property Owners Association, Inc. and Elizabeth A. Bushey, Individually, and on behalf of all others similarly situated v. Island Pointe, LLC; Leonard T. Browne; Complete Building Corporation; Tri-County Roofing, Inc.; Creekside, Inc.; American Residential Services, LLC d/b/a ARS/Rescue Rooter Charleston; Andersen Windows, Inc.; Atlantic Building Construction Services, Inc. n/k/a Atlantic Construction Services, Inc.; Christopher N. Union; Builder Services Group, Inc. d/b/a Gale Contractor Services; Novus Architects, Inc. f/k/a SGM Architects, Inc.; Tallent and Sons, Inc.; WC Services, Inc.; CRG Engineering, Inc.; Certaineed Corporation; Kelly Flooring Products, Inc. d/b/a Carpet Baggers; and John Doe 1-60

Case No.: 2015-CP-10-0955  
YCR File: 15491-20150066

Dear Ms. Kitchings:

Please find enclosed an original Motion for Extension of Time to File/Serve Initial Reply Brief of Appellants and Proof of Service regarding the same for filing in the above-referenced matter.

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

Sincerely,

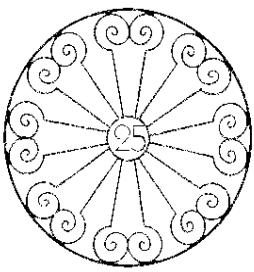
YOUNG CLEMENT RIVERS, LLP

Pollyana Bell  
Project Assistant

/pbb

Enclosures

cc (via US mail & e-mail): Stephanie D. Drawdy, Esquire  
Joshua F. Evans, Esquire  
Justin O. Lucey, Esquire  
James A. Atkins, Esquire



# YCR LAW

Young Clement Rivers, LLP

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Trucking and Transportation • Workers Compensation

**THE FOLLOWING PAGES ARE FOR IMMEDIATE DELIVERY**

To: 18037341839  
From: pbell@ycrlaw.com  
Date: August 05, 03:14:42 PM EDT  
Subj: Palmetto Pointe v. Island Pointe; Appellate Case No. 2019-001520  
Pages: 8

Please find the attached motion for filing in the above-referenced matter. If there are any issues with this filing please let us know.

Thank you,  
Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369

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**SC Court of Appeals**



In view of current conditions and for the foreseeable future, YCR will be operating pursuant to its plan for continuous business services. With the imperative of safety in mind, our attorneys and staff will be working remotely as well as in our offices. In any event, we expect and intend to be able to respond in a timely manner to the needs and the requirements of clients, courts, colleagues, and friends. Thank you.

Young Clement Rivers, LLP  
<http://www.ycrlaw.com>  
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