



**Katon E. Dawson, Jr.**  
*Associate*  
Telephone: 803.253.6854  
Direct Fax: 803.255.8017  
katondawson@parkerpoe.com

Atlanta, GA  
Charleston, SC  
Charlotte, NC  
Columbia, SC  
Greenville, SC  
Raleigh, NC  
Spartanburg, SC

October 20, 2020

**Via E-mail [ctappfilings@sccourts.org] and U.S. Mail**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
**Oct 20 2020**  
**SC Court of Appeals**

**Re: Scott B. Nash, et. al. v. Lennar Carolinas, LLC, et. al.**  
**Appellate Case Number: 2020-001215**

Dear Mrs. Kitchings:

Lennar Carolinas, LLC ("Lennar") pursuant to 240(a), SCACR, respectfully requests an extension of time of thirty (30) days within which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal.

This is Lennar's first request for an extension of time within which to file its Initial Brief and Designation of Matter to be included in the Record on Appeal.

Presently, Lennar's Initial Brief and Designation of Matter to be included in the Record on Appeal must be filed with the Court on or before November 2, 2020. Therefore, Lennar is requesting an order granting an extension of thirty (30) days to file its Initial Brief and Designation of Matter to be included in the Record on Appeal, up to and including Wednesday, December 2, 2020.

Attached to this First Motion for Extension please find, a copy of the Proof of Service, and a check in the amount of \$50.00 for the filing fee. As evidenced by the attached Proof of Service, we are providing counsel for the Respondents with a copy of same.

Sincerely,

Katon E. Dawson, Jr.

KED:bg  
Enclosures

Cc:  
R. Britton Kelly ([britt@kellylawsc.com](mailto:britt@kellylawsc.com)) (via Email only)

PPAB 5897499v1.docx

October 20, 2020  
Page 2

Jeffrey A. Ross ([jross@rcaalaw.com](mailto:jross@rcaalaw.com)) (via Email only)  
Philip P. Cristaldi, III ([pcristaldi@rcaalaw.com](mailto:pcristaldi@rcaalaw.com)) (via Email only)  
Joseph Kenneth Carter, Jr. ([KCarter@TurnerPadget.com](mailto:KCarter@TurnerPadget.com)) (via Email only)  
Carmelo B. Sammataro, ([ssammataro@turnerpadget.com](mailto:ssammataro@turnerpadget.com)) (via Email only)

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

---

Case No. 2018-CP-10-01514  
Appellate Case Number: 2020-001215

---

**RECEIVED**  
**Oct 20 2020**  
**SC Court of Appeals**

Scott B. Nash, Terrell Nash, Ronald Kevin Elliott, Cheryl Ann Elliott, Adam Smith, Patricia Smith, Richard M. Wcislak, Kanhaka Wcislak, Jessica L. Monsell, Anthony P. Lamantia, Janine Lamantia, Andrew Hedlund, Kelly Hedlund, Chloe Alsberry, Joey Alsberry, Benjamin H. Broadhead and Jerica N. Brodhead, Plaintiffs

v.

Lennar Carolinas, LLC, Quality Marble, Inc., Jenkins Plumbing Company, LLC, D&S Plumbing, Inc., John Doe 1, John Doe 2, John Doe 3, Unique Marble Design, LLC, and Builder Services Group, Inc., Defendants

of which Lennar Carolinas, LLC is the Appellant and Scott B. Nash, Terrell Nash, Ronald Kevin Elliott, Cheryl Ann Elliott, Adam Smith, Patricia Smith, Richard M. Wcislak, Kanhaka Wcislak, Jessica L. Monsell, Anthony P. Lamantia, Janine Lamantia, Andrew Hedlund, Kelly Hedlund, Benjamin H. Brodhead, and Jerica N. Brodhead are the Respondents.

---

**PROOF OF SERVICE**

---

The undersigned hereby certifies that on October 20, 2020, copies of **Lennar's First Motion for Extension of Time to File its Initial Brief and Designation of Matter to be included in the Record on Appeal** were served on all counsel of record by email, addressed as follows:

R. Britton Kelly, Esquire  
Kelly Law Firm, LLC  
180 Spring Street  
Charleston, SC 29403  
Phone: (843) 991-4128  
[britt@kellylawsc.com](mailto:britt@kellylawsc.com)

*Attorney for Respondents*

Jeffrey A. Ross, Esquire  
Philip P. Cristaldi, III, Esquire  
1242 White Flat Road  
Mt. Pleasant, South Carolina 29464  
Phone: (843) 329-4040  
[jross@rcaalaw.com](mailto:jross@rcaalaw.com)  
[pcristaldi@rcaalaw.com](mailto:pcristaldi@rcaalaw.com)

*Attorneys for Unique Marble Design, LLC*

Joseph Kenneth Carter, Jr.  
Carmelo B. Sammataro, Esquire  
Turner, Padget, Graham & Laney, P.A.  
Post Office Box 1473  
Columbia, SC 29202  
Phone: (803) 254-2200  
[KCarter@TurnerPadget.com](mailto:KCarter@TurnerPadget.com)  
[SSammataro@TurnerPadget.com](mailto:SSammataro@TurnerPadget.com)

*Attorneys for Builder Services, Group, Inc.*



---

James Lynn Werner, (SC Bar No. 6029)  
Taylor H. Stair (SC Bar No. 78430)  
Katon E. Dawson, Jr. (SC Bar No. 101167)  
Robert C. Osborne III (S.C. Bar No. 101827)  
Parker Poe Adams & Bernstein LLP  
1221 Main Street, Suite 1100  
Columbia, SC 29201  
(803) 255-8000

October 20, 2020  
Columbia, SC

*Attorneys for Appellant Lennar Carolinas, LLC*