

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

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Appeal from Beaufort County
Court of Common Pleas

APR 23 2021

SC Court of Appeals

Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2020-001659
Circuit Court Case No. 2019-CP-07-00223

Tracey Lee Lunenburg,

Respondent,

v.

Vincent J. Aiello, Jr., Atlantic Heritage Builders, Inc.,
Yuko Construction, Inc., d/b/a Advanced Roofing, Inc.,
Bismark Lara, Premium Stucco, and Shaw
Manufacturing's Wrought Iron Works, Inc.,

Defendants,

Vincent J. Aiello, Jr. and Atlantic Heritage Builders, Inc.,

Third-Party Plaintiffs,

Palatial Homes, Inc., Palatial Homes Design, LLC,
and Palatial Building Group, LLC,

Third-Party Defendants,

Of Whom Vincent J. Aiello, Jr. and Atlantic Heritage
Builders, Inc. are,

Appellants,

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

FINN LAW FIRM, PC
Thomas J. Finn SC Bar 78270
38D New Orleans Road (29928)
PO Box 6003
Hilton Head Island, SC 29938
(843)682-3555
Attorney for the Plaintiff

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW Respondent, by and through her undersigned counsel, pursuant to Rule 263(b), SCACR, and move for an extension of thirty (30) days' additional time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court Respondent's Initial Brief is due April 23, 2021, On account of work-related and other time commitments, Respondent respectfully requests that this deadline be extended by 30 days (from April 23, 2021,) i.e., through May 23, 2021. Respectfully, Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellant.

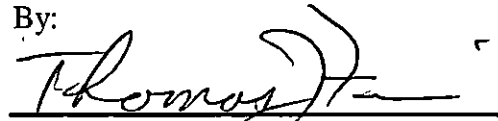
WHEREFORE, Respondent moves this Honorable Court to grant them an additional extension of 30 days' time to file/serve her initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be May 23, 2021 according to the undersigned's calculations. Further, Respondent 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 Brief of Respondent (Appellate Case No. 2020-001659)*

Respectfully submitted,

FINN LAW FIRM, PC

By:



Thomas J. Finn, SC Bar No. 78270

38D New Orleans Road

PO Box 6003

Hilton Head Island, South Carolina

29938

(843) 682-3555

Attorney for Respondent

Hilton Head Island, South Carolina

Dated: April 20, 2021

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SC Court of Appeals

Appeal from Beaufort County
Court of Common Pleas

Carmen T. Mullen, Circuit Court Judge

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Tracey Lee Lunenburg,

Respondent,

v.

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Manufacturing's Wrought Iron Works, Inc.,

Defendants,

Vincent J. Aiello, Jr. and Atlantic Heritage Builders, Inc.,

Third-Party Plaintiffs,

Palatial Homes, Inc., Palatial Homes Design, LLC,
and Palatial Building Group, LLC,

Third-Party Defendants,

Of Whom Vincent J. Aiello, Jr. and Atlantic Heritage
Builders, Inc. are,

Appellants,

PROOF OF SERVICE

I, Thomas J. Finn, of Finn Law Firm, PC, attorney for Respondent, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF RESPONDENT** was served on all other parties to this appeal on April 20, 2021 via U.S. Mail their following counsel of record:

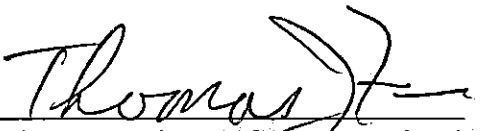
Jason Daigle, Esquire
Russell G. Hines
Nicholas Rivera
Clement Rivers, L.L.P
P.O. Box 993
Charleston, South Carolina
29402

and via email to jdaigle@ycrlaw.com

Respectfully Submitted:

Finn Law Firm, PC

By:


Thomas J. Finn, (SC Bar No. 78270)
Attorney for the Respondent

Charleston, South Carolina

Dated: April 20, 2021

Thomas J. Finn, Esquire
Licensed in SC, GA and CT

F|F FINN LAW FIRM, PC

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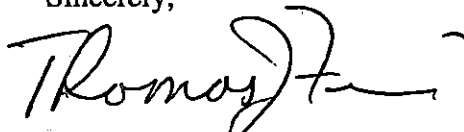
The Honorable Jenny Abbot Kitchings
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina-29211

RE: Tracey Lee Lunenberg, Respondent v. Vincent J. Aiello, Jr. et al.
Appellate Case No.: 2020-001659

Dear Ms. Kitchings:

Enclosed please find Respondent's Motion for an Extension of Time to File Initial Brief of Respondent along with Proof of Service on opposing counsel. If you have any questions please do not hesitate to contact my office.

Sincerely,



Thomas J. Finn

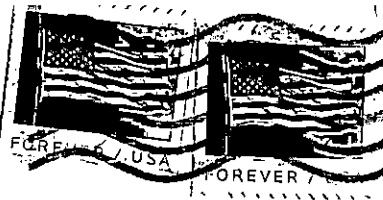
cc: Jason Daigle, Esquire

FINN LAW FIRM, PC

P.O. Box 6003
Hilton Head Island, South Carolina 29938

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SC Court of Appeals

The Honorable Jenny Abbot Kitchens
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

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