

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

---

**RECEIVED**

MAY 20 2021

**SC Court of Appeals**

Appeal from Beaufort County  
Court of Common Pleas

---

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 Respondent*

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 their initial brief and corresponding designation of matter to be included in the record on appeal.

Presently, by order of this Court filed May 3, 2021, the deadline for Respondent's initial brief and designation of matter is May 23, 2021. On account of Respondent's counsel's trial schedule, Respondent respectfully requests that this deadline be extended by 30 days (from May 23, 2021), i.e., through June 22, 2021 Respondent's counsel is currently number two on the jury trial roster for Beaufort County for the week of May 24, 2021. Respondent's counsel is a solo practitioner and would be unduly burdened should the extension not be granted. Respondent believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon Appellants.

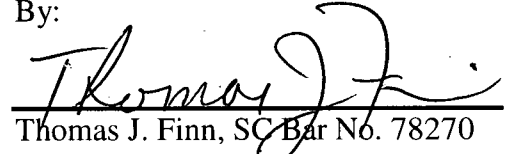
WHEREFORE, Respondent moves this Honorable Court to grant her an additional extension of 30 days' time to file/serve their initial brief and corresponding designation of matter to be included in the record on appeal. With the extension requested herein, the new deadline for filing/serving their initial brief and designation of matter would be June 22, 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 (Plaintiff Appellate Case No. 2020-001659)*

Respectfully submitted,

FINN LAW FIRM, PC

By:

A handwritten signature in black ink, appearing to read "Thomas J. Finn", is written over a horizontal line.

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: May 17, 2021

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

MAY 20 2021

SC Court of Appeals

---

Appeal from Beaufort County  
Court of Common Pleas

---

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,

---

**PROOF OF SERVICE**

---

I, Thomas J. Finn, of Finn Law Firm, PC, attorney for Plaintiff, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE INITIAL BRIEF OF APPELLANTS** was served on all other parties to this appeal on May 17, 2021 via email (see attached) to their following counsel of record:

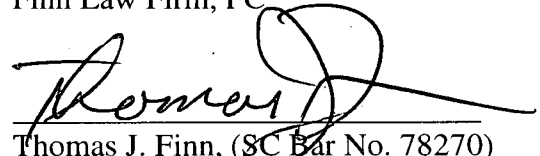
Jason Daigle  
Clement Rivers, L.L.P.  
25 Calhoun Street, Ste 400  
Charleston, S.C. 29401  
[jdaigle@ycrlaw.com](mailto:jdaigle@ycrlaw.com)

Attorney for the Appellant

Respectfully Submitted:

Finn Law Firm, PC

By:



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

Hilton Head Island, South Carolina

Dated: May 17, 2021

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

**FLE FINN LAW FIRM, PC**

38D New Orleans Road (location)  
P.O. Box 6003 (mailing)  
Hilton Head Island, SC 29938  
Ph 843-682-3555 Fx 843-682-3558  
thomas@finnlawfirm.com

**RECEIVED**

**MAY 20 2021**

**SC Court of Appeals**

May 17, 2021

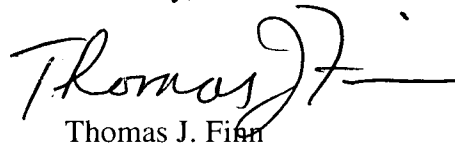
The Honorable Jenny Abbot Kitchings  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

**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,

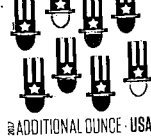


Thomas J. Finn

cc: Jason Daigle, Esquire

# FINN LAW FIRM, PC

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



FOREVER / USA

**RECEIVED**

MAY 20 2021

**SC Court of Appeals**

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

2921131629 B012

