

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

---

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

---

Appellate Case No. 2020-001048  
Case No. 2014-2424

---

**RECEIVED**

**Jun 10 2021**

**S.C. SUPREME COURT**

Patricia Damico and Lenna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brettany Beutow, Edward and Sylvia Dengg, Jonathan and Theresa Douglass, Anthony and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and Cynthia Camara, and Matthew Collins, Respondents,

v.

Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc. TJB Trucking/Leasing, LLC, Paragon Site Constructors, Inc., Civil Site Environmental and Rick Bryant, Individually, Defendants,

Of which Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc. TJB Trucking/Leasing, LLC, and Civil Site Environmental are Respondents.

And

Lennar Carolinas, LLC, Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometries Consulting, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource Southeast Group, LLC, and Low Country Renovations and Siding, LLP, Third-Party Defendants,

Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource Southeast Group, LLC, are also Respondents.

And

Decor Corporation, Fourth Party Plaintiff,

v.

Baranov Flooring, LLC, DJ Construction Services, LLC, Creative Wood Floors, LLC, Geraldo Cunha, Ebenezer Flooring, LLC, Emmanuel Flooring and Siding, LLC, Eusi Flooring and Covering, LLC, Nicolas Flores, Alexander Martinez, Isidini Mejia, Juan Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, Jose Paz Castro Hernandez, Divinio Aperecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastio Luiz de Araujo, and John Does 1-4, Fourth Party Defendants.

---

MOTION FOR EXTENSION OF TIME

---

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, Appellants Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglas, Czarra and Chad England, Lena Lucas, and Danny and Ellen Davis Morrow (“Appellants”), respectfully request a ten (10) day extension of time to file their brief and the copies of the Appendix with the Court. Opposing counsel for Lennar Carolinas, LLC does not object to this request for extension. A copy of counsel’s express written consent is attached hereto as Exhibit A.

This request is necessitated due to counsel’s current work and personal commitments. A ten (10) day extension of time will serve the interests of justice by allowing counsel adequate time to prepare a thorough brief in this matter. Appellants do not request this extension for the impermissible purpose of delay.

Appellants' brief and the copies of the Appendix are currently due on Monday, June 28, 2021. If this request is granted, Appellants' new due date would be Thursday, July 8, 2021. Accordingly, Appellants respectfully request that this Court enter an Order extending the deadline for filing their brief and copies of the Appendix until July 8, 2021. Appellants further request that the current deadline be held in abeyance while the Court considers this request.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/ Jesse Sanchez  
98 ½ Broad Street, Suite B  
Charleston, SC 29401  
(843) 814-8181  
jesse@jessesanchezlaw.com

THE HAYES LAW FIRM, LLC

John C. Hayes, IV  
P.O. BOX 22497  
Charleston, SC 29413  
(843) 805-7003  
jhayes@hayeslaw.org

Attorneys for Petitioners  
Patricia Damico, Joshua and Brettany Beutow, Bryan  
and Cynthia Camara, Matthew Collins, Jonathan and  
Teresa Douglas, Czarra and Chad England, Lena  
Lucas, and Danny and Ellen Davis Morrow

June 10, 2021  
Charleston, South Carolina