

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

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

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

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**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.

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PROOF OF SERVICE

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I, the undersigned, certify that I have served Appellants Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglass, Czarra and Chad England, Lenna Lucas, and Danny and Ellen Davis Morrow's *Motion for Extension of Time* on all counsel of record by emailing a copy to their respective electronic mailboxes and to all *Pro Se* parties by mail on June 10, 2021 at the following addresses. Pursuant to the May 20, 2020 Order of the South Carolina Supreme Court, as amended on May 29, 2020, a copy of the aforementioned email correspondence is attached.

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Respectfully submitted,

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June 10, 2021  
Charleston, South Carolina

**From:** Jesse Sanchez jesse@jessesanchezlaw.com  
**Subject:** Patricia Damico v. Lennar Carolinas - Case No. 2020-001048  
**Date:** June 10, 2021 at 1:19 PM



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Counsel,

For service, please find the attached Cover Letter and Motion for Extension of Time, which is being filed momentarily with the South Carolina Supreme Court via electronic One Drive submission.

Regards,

Jesse

--

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June 10, 2021

**VIA ONE DRIVE ELECTRONIC SUBMISSION**

The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

**Re: Patricia Damico, et. al. v. Lennar Carolinas, LLC, et al.  
Case No. 2014-CP-08-2424  
Appellate Case No. 2020-001048**

Dear Mr. Shearouse,

With regard to the above-referenced matter, attached, please find the following for filing with the Court:

1 *Motion for Extension of Time on behalf of Appellants Patricia Damico, Joshua and*



1. *Motion for Extension of Time on behalf of Appellants Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglass, Czarra and Chad England, Lenna Lucas, and Danny and Ellen Davis Morrow.*
2. Proof of Service.

Pursuant to the March 20, 2020 Order of the South Carolina Supreme Court, as amended on May 29, 2020, I have deposited a check from my firm for the \$50.00 filing fee in today's outgoing mail.

Thank you for your attention to this matter. Should you have any questions regarding this submission, please do not hesitate to contact me directly at (843) 814-8181.

Sincerely,

s/Jesse Sanchez  
Jesse Sanchez  
SC Bar No. 101906

Attorney 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

Cc: All Counsel of Record (Via Email Only);

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