

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

S.C. SUPREME COURT

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

Appellate Case No. 2020-001048

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 Aparecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastio Luiz de Araujo, and John Does 1-4, Fourth Party Defendants,

Of whom 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 are the Petitioners.

PROOF OF SERVICE

I, the undersigned, certify that I have served Petitioners' 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 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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s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)

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August 9, 2021

Charleston, South Carolina

From: Jesse Sanchez jesse@jessesanchezlaw.com 
Subject: Patricia Damico v. Lennar Carolinas - Case No. 2020-001048
Date: August 9, 2021 at 5:06 PM



To: Werner, James L. jimwerner@parkerpoe.com, McGee, Jenna K. jennamcgee@parkerpoe.com, Dawson, Jr., Katon E. katondawson@parkerpoe.com, cc: sstephens@arslawsc.com sstephens@arslawsc.com, clawrimore@arslawsc.com, sbrown@ycrlaw.com, cchase@ycrlaw.com, pbd@aikenbridges.com, mjordan@steinberglawfirm.com, cmeehan@steinberglawfirm.com, jhayes@hayeslaw.org, sphughes@hgpha.com, kcarlsten@carlockcopeland.com, cemge@rlattorneys.com, bboyd@murphygrantland.com, tnewton@murphygrantland.com, rharrell@murphygrantland.com, dcobb@turnerpadget.com, rkendall@murphygrantland.com, bcraven@murphygrantland.com, snettles@richardsonplowden.com, cganjehsani@richardsonplowden.com, mstubbs@brblegal.com, dnewberry@hallboothsmith.com, cvarnado@seibelsfirm.com, alan.belcher@hallboothsmith.com, ssmith@scnlaw.com, zclosser@scnlaw.com, swheeler@scnlaw.com, Dean, Erin erindean@tgdcpa.com, jrogers@wardfirm.com, jelliott@richardsonplowden.com, fhgrimball@richardsonplowden.com, dcleveland@clawsonandstaubes.com, tricolette@clawsonandstaubes.com, jenny@besthoneycutt.com, Dawn Southern dawn@besthoneycutt.com, trippett.boineau@mgclaw.com, heath.stewart@mgclaw.com, adam.ribock@mgclaw.com, pflynn@popeflynn.com, mallen@popeflynn.com, mew@roblaw.net, dblack@hgpha.com, rtate@gwblawfirm.com, bfarrar@gwblawfirm.com, cdubose@hsblawfirm.com, pcristaldi@rclawsc.com, jross@rclawsc.com, swinograd@rclawsc.com, ewelk@rclawsc.com, bmyers@rclawsc.com, jlingle@hayeslaw.org, Kim Weldin kweldin@hayeslaw.org, Nina Meola nmeola@hayeslaw.org

Counsel,

For service, please find the attached Cover Letter and Motion for Extension of Time, which is being submitted to the South Carolina Supreme Court momentarily via OneDrive electronic submission.

Regards,

Jesse

--
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August 9, 2021

**VIA ONEDRIVE ELECTRONIC SUBMISSION
AND US PRIORITY EXPRESS MAIL**

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
1231 Gervais Street
Columbia, SC 29201



Re: Patricia Damico, et. al. v. Lennar Carolinas, LLC, et al.

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 Petitioners 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,
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Cynthia Camara, Matthew Collins, Jonathan
and Teresa Douglas, Czarra and Chad
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Cc: All Counsel of Record (Via Email Only)

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