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Sep 23 2021

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In the Court of Appeals**

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Appellate Case No. 2021-000325

Evarista Juan Lorenzo, Appellant,

v.

Port City Elevator, Inc.; Alan Topper d/b/a All Construction; 2020 Custom Contractors a/k/a 2020 Custom Contractors, LLC; Citadel Site Management, LLC; DVBT Construction a/k/a DVBT Construction, LLC; DVBT Multiservices, LLC; Beverly Construction Group, LLC; Beverly Homes, LLC; Beverly Homebuilders, LLC; Strand Paint Contractors, LLC; Depaz Painting, LLC; Enhanced Heating & Air Conditioning, LLC; Carlton Pender, and Joan Pender, Defendants,

Of Which,

Alan Topper d/b/a All Construction; Citadel Site Management, LLC; DVBT Construction a/k/a DVBT Construction, LLC; DVBT Multiservices, LLC; Beverly Construction Group, LLC; Beverly Homes, LLC; Beverly Homebuilders, LLC; Strand Paint Contractors, LLC; Depaz Painting, LLC and Enhanced Heating & Air Conditioning, LLC are the Respondents.

**MOTION FOR EXTENSION OF TIME FOR APPELLANT TO SERVE AND FILE
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

COMES NOW the Appellant, Evarista Juan Lorenzo, and hereby requests a thirty (30) day extension of time to serve and file her Initial Brief and Designation of Matter, respectfully showing as follows:

1. That this is second requested extension requested of the below-signed since being retained and making an appearance in this matter, although this request being the fourth in the pendency of this appeal.

2. That since entering his appearance in this matter, the below-signed had intervening filing deadlines, including with the United States Fourth Circuit Court of Appeals (Case No. 21-1654), which together with other previously scheduled obligations constitute good cause and/or exceptional circumstance for the instant request for extension, which is intended to be the last of such request.

3. That prior to making this motion, the below-signed consulted with counsel for the respondent who does not oppose of object to an extension as requested by Appellant herein.

WHEREFORE Appellant respectfully requests that this Court issue an Order granting unto the Appellant a thirty (30) day extension of time to file and serve her Initial Brief and designation of matter, it due on October 25, 2021.

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APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Michael G. Nettles, Circuit Court Judge

Common Pleas Court Case No. 2018-CP-22-00824
Appellate Case No. 2021-000325

Evarista Juan Lorenzo, Appellant,

v.

Port City Elevator, Inc.; Alan Topper d/b/a All Construction; 2020 Custom Contractors a/k/a 2020 Custom Contractors, LLC; Citadel Site Management, LLC; DVBT Construction a/k/a DVBT Construction, LLC; DVBT Multiservices, LLC; Beverly Construction Group, LLC; Beverly Homes, LLC; Beverly Homebuilders, LLC; Strand Paint Contractors, LLC; Depaz Painting, LLC; Enhanced Heating & Air Conditioning, LLC; Carlton Pender, and Joan Pender, Defendants,

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PROOF OF SERVICE

The undersigned certifies that she served a copy of the foregoing **Motion for Extension of Time** to all counsel of record on September 23, 2021, by mailing a copy of same, electronically or with proper postage affixed thereto, as follows:

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