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Mar 18 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Jennifer B. McCoy

Appellate Case No. 2021-001050
Common Pleas Case No. 2016-CP-10-03783

The Retreat at Charleston National Country Club Home Owners Association, Inc. and The Retreat at Charleston National Country Club Horizontal Property Regime.....Plaintiffs,

v.

Winston Carlyle Charleston National, LLC; Colin R. Campbell Construction, Inc.; Colin Campbell, Individually; C.R. Campbell Construction Co., Inc.; Colin Campbell Construction, LLC; Builders FirstSource-Southeast Group, LLC; Builders FirstSource, Inc.; Americo Roofing Concepts, Inc.; DVS, Inc.; Advanced Building Connection, LLC; Guy C. Lee Building Materials, LLC; WS Contractors, LLC; Dino Schwartz, Individually; ECC Contracting, LLC; Hurley Services, LLC; McDaniel Construction Co., LLC; AC Construction Corp.; AC Construction, Inc.; L&G Construction Group, LLC; Liollo Architecture; JC Construction d/b/a JC Construction, LLC a/k/a JC Contractors a/k/a JC Contractors, LLC; Soto & Vasquez Construction, LLC a/k/a Costa De Oliveira Construction, LLC a/k/a Costa De Oliveira Construction, LLC; Solesmar Jesus De Oliveira; Wilson Lucas Sales d/b/a Miracle Siding; Miracle Siding, LLC; Royal Homes of SC, Inc.; Colleen Batissa; Christopher Batissa; Norma Ferreira Bruno; Mendez Construction, LLC; Juan Garza Ramos; Juan Garza Ramos d/b/a Juan Constructors; Jessica Marroquin; Jessica Marroquin d/b/a Marroquin Construction; Carlos Marroquin; Carlos Marroquin and Jessica Marroquin d/b/a Marroquin Construction; Feliciano Cruz Silva Garcia Roofing, LLC; Givair De Caris; and Mario Salgado.....Defendants,

Builders FirstSource-Southeast Group, LLC.....Third-Party Plaintiff, Appellant,

v.

Pohlman Quality Contractors; Pohlman Quality Exteriors; Palmetto Trim and Renovation; Edward Bruce Witham; and East Coast Carpentry.....Third-Party Defendants,

Of which Palmetto Trim and and Renovation; Hurley Services, LLC; ECC Contracting, LLC; East Coast Carpentry; AC Construction, Inc.; WS Contractors, LLC; Pohlman Quality Exteriors, Inc.; and L&G Construction Group, LLC are the.....Respondents.

**RESPONDENT AC CONSTRUCTION, INC.’S MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Respondent, AC Construction, Inc., respectfully submits its motion for a thirty (30) day extension to file Respondent’s initial brief and designation of matter in the above-captioned appeal. The current deadline is March 30, 2022. This is the first request for an extension of this deadline. Appellant consents to this motion.

This extension is requested due to counsel’s workload and need for additional time to prepare the brief in opposition to Appellant’s brief. The proposed new deadline would be April 29, 2022 according to the undersigned’s calculation. This motion is made in good faith and not for the purpose of delay.

WHEREFORE, Respondent AC Construction, Inc. requests that the court grant permission for Respondent to file its initial brief and designation of matter by April 29, 2022. Finally, Respondent respectfully requests the court hold its current briefing deadline in abeyance until it acts on this motion.

Signature Page to Follow

Respectfully submitted,

LUZURIAGA MIMS, LLP

s/J. Barnwell Fishburne, Jr.

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Construction, LLC a/k/a Costa De Oliveira Construction, LLC a/k/a Costa De Oliveira
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Miracle Siding, LLC; Royal Homes of SC, Inc.; Colleen Batissa; Christopher Batissa; Norma
Ferreira Bruno; Mendez Construction, LLC; Juan Garza Ramos; Juan Garza Ramos d/b/a Juan
Constructors; Jessica Marroquin; Jessica Marroquin d/b/a Marroquin Construction; Carlos
Marroquin; Carlos Marroquin and Jessica Marroquin d/b/a Marroquin Construction; Feliciano
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he has served the foregoing “**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**” upon all counsel of record via electronic mail only to counsels’ last known email address on this 18th day of March 2022.

LUZURIAGA MIMS, LLP

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