

RECEIVED

Mar 25 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 RegimePlaintiffs,

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 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 ECC CONTRACTING, LLC’S MOTION FOR
EXTENSION OF TIME TO FILE RESPONDENT’S INITIAL
BRIEF AND DESIGNATION OF MATTER**

Respondent ECC Contracting, LLC respectfully submits its motion for a forty-five (45) day extension to file its 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 counsels’ workload and need for additional time to prepare Respondent ECC Contracting, LLC’s initial brief in opposition to Appellant’s brief.¹ The proposed new deadline would be May 16, 2022, according to the undersigned’s calculation. This motion is made in good fait and not for the purpose of delay.

WHEREFORE, Respondent ECC Contracting, LLC requests that the court grant permission to file its initial brief and designation of matter by May 16, 2022. Finally, Respondent ECC Contracting, LLC respectfully requests the court hold its current briefing deadline in abeyance until it acts on this motion.

[SIGNATURE PAGE TO FOLLOW]

¹ Attorney F. Heyward Grimbball has Protection from April 27, 2022 – May 4, 2022.

Respectfully submitted,

**RICHARDSON PLOWDEN &
ROBINSON, P.A.**

By: s:/F. Heyward Grimball
James H. Elliott, Jr. (SC Bar. No 13620)
F. Heyward Grimball (SC Bar. No. 101743)
235 MaGrath Darby, Suite 100
Mt. Pleasant, SC 29464
T: (843) 805-6550; F:(843) 805-6588
jelliott@RichardsonPlowden.com
fhgrimball@RichardsonPlowden.com

BEST LAW, P.A.

By: s/M. Shanter Chaparro
L. Dean Best (S.C. Bar No. 11952)
M. Shanter Chaparro (S.C. Bar No. 102419)
Post Office Box 13466
102 Wappoo Creek Drive, Suite 8 (29412)
Charleston, South Carolina 29422
T: (843) 793-4744; F:
dean@bestlawsc.com
shanter@bestlawsc.com

March 25, 2022

RECEIVED

Mar 25 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 RegimePlaintiffs,

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 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.

CERTIFICATE OF SERVICE

The undersigned counsel here by certify that they have served Respondent ECC Contracting, LLC’s “**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 25th day of March 2022.

Respectfully submitted,

**RICHARDSON PLOWDEN &
ROBINSON, P.A.**

By: s/F. Heyward Grimball
James H. Elliott, Jr. (SC Bar. No 13620)
F. Heyward Grimball (SC Bar. No. 101743)
235 MaGrath Darby, Suite 100
Mt. Pleasant, SC 29464
T: (843) 805-6550; F:(843) 805-6588
jelliott@RichardsonPlowden.com
fhgrimball@RichardsonPlowden.com

BEST LAW, P.A.

By: s/M. Shanter Chaparro
L. Dean Best (S.C. Bar No. 11952)
M. Shanter Chaparro (S.C. Bar No. 102419)
Post Office Box 13466
102 Wappoo Creek Drive, Suite 8 (29412)
Charleston, South Carolina 29422
T: (843) 793-4744; F:
dean@bestlawsc.com
shanter@bestlawsc.com

March 25, 2022