

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM HORRY COUNTY
Court of Common Pleas
Paul M. Burch
Circuit Court Judge

MAY 28 2013

S.C. SUPREME COURT

On Certiorari to the Court of Appeals of South Carolina
Opinion No. 4617 (S.C. Ct. App. filed September 9, 2009)
Appellate Case No. 2010-149288

CONSENT MOTION FOR EXTENSION

Thelma M. Poch, as Personal
Representative for the Estate of
Kenneth O. Poch,Petitioner,

v.

Bayshore Concrete
Products/South Carolina, Inc.,
Bayshore Concrete Products
Corporation, Tidewater
Skanska Group, Inc., and
Tidewater Skanska, Inc.,Defendants,

of whom Bayshore Concrete
Products/South Carolina, Inc.,
Bayshore Concrete Products
Corporation are theRespondents.

and

Kevin Key and Sandra Key,Petitioners,

v.

Bayshore Concrete
Products/South Carolina, Inc.,
Bayshore Concrete Products

**Corporation, Tidewater
Skanska Group, Inc., and
Tidewater Skanska, Inc.,Defendants,**

**of whom Bayshore Concrete
Products/South Carolina, Inc.,
Bayshore Concrete Products
Corporation are theRespondents.**

and

**Thelma M. Poch, as Personal
Representative for the Estate of
Kenneth O. Poch and Julius
Poch,Petitioners,**

v.

**Bayshore Concrete
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Bayshore Concrete Products
Corporation, Tidewater
Skanska Group, Inc., and
Tidewater Skanska, Inc.,Defendants,**

**of whom Bayshore Concrete
Products/South Carolina, Inc.,
Bayshore Concrete Products
Corporation are theRespondents.**

**Christine Companion Varnado
Jason Scott Luck
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127 King St., Ste 100
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843.722.6777
Attorneys for Petitioners**

**Robert B. Varnado
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843.737.7300
Attorneys for Petitioners**

**John R. Kuhn
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Charleston, SC 29401
843.577.3700
Attorneys for Petitioners**

Petitioners, pursuant to Rule 240, SCACR, move this Court to extend the response times for Respondents' Motion to Supplement the Record on Appeal as follows: (1) a 30 day extension for the Petitioners to prepare their response (the new deadline would be June 27, 2013) and (2) a six day extension for the Respondents to prepare their reply, if any (the new deadline would be July 8, 2013).

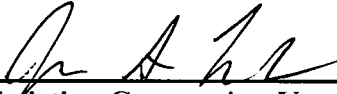
The Petitioners would show the following in support of their motion: (1) the nearly 900 pages of documents Respondents designated for the Appendix to the Record on Appeal require additional time for the Petitioners to prepare a designation in response, pursuant to Rule 212(b), SCACR; (2) the issues raised by the Respondents' motion require additional time to prepare an adequate response; (3) no party shall be prejudiced by these extensions; and (4) the Respondents consent to the Petitioners' requested relief.

Petitioners respectfully request that this Court hold any motion response deadlines in abeyance pending the consideration of this motion.

[signature page follows]

We so move:

Dated: May 23, 2013


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SEIBELS LAW FIRM, P.A.
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and

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103 Church Street
Mount Pleasant, SC 29464
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Attorneys for Petitioners

We consent:

Dated: May 23, 2013

/s/ Barrett R. Brewer*
Barrett R. Brewer
Clawson & Staubes, LLC
126 Seven Farms Drive, Suite 200
Charleston, SC 29492
843.577.2026 (phone)
Attorneys for Respondents

* signed with Mr. Brewer's
express consent

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CERTIFICATE OF SERVICE

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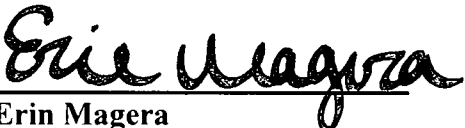
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**I certify that I have served the *Consent Motion for Extension* on the Clerk of
the Supreme Court at P.O. Box 11330, Columbia, SC 29211 and on counsel for the
Respondents by serving copies of the same via U.S. Mail on 23 May 2013 to the
following:**

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Erin Magera
Legal Assistant

23 May 2013