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**Feb 22 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
Jennifer B. McCoy, Circuit Judge

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Court of Common Pleas Case No. 2020-CP-10-02430  
Appellate Court Case No. 2022-001170

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Chandler Construction Services, Inc.,

Appellant,

v.

Bellsouth Telecommunication, LLC d/b/a AT&T South Carolina,

Respondent.

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**MOTION FOR EXTENSION**

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Pursuant to Rule 263(b), SCACR, Appellant, by its undersigned counsel respectfully requests a thirty-day extension to file Appellant's Reply brief in the above-captioned matter. This request is based on long-standing travel plans out of the country by counsel for Appellant. If granted, the new deadline to file will be April 7, 2023. For these reasons, counsel requests the motion be granted.

Respectfully submitted,

ROSEN HAGOOD, LLC

By: *s/Elizabeth F. Nicholson*

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*Counsel For Appellant*

February 22, 2023  
Charleston, SC

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Respondent.

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**PROOF OF SERVICE**

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I hereby certify that on February 22, 2023, I have served the **Appellant's Motion for Extension** by email, pursuant to The Supreme Court of South Carolina's Order, dated May 6, 2022, to the attorneys of record as follows:

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*Counsel for Appellant*

Charleston, South Carolina  
February 22, 2023

**From:** [Jessica McDonald](#)  
**To:** [matt.bogan@nelsonmullins.com](mailto:matt.bogan@nelsonmullins.com); [rwooda@lowcountry.com](mailto:rwooda@lowcountry.com); [Mary Williams](#)  
**Cc:** [Chip Bruorton](#); [Elizabeth Nicholson](#); [roxanne.englin@nelsonmullins.com](mailto:roxanne.englin@nelsonmullins.com)  
**Subject:** Chandler Construction v. BellSouth Telecommunications Case No.: 2022-001170  
**Date:** Wednesday, February 22, 2023 4:26:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[Chandler Construction Motion for Extension.pdf](#)


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Good afternoon:

Attached please find Chandler Construction Services, Inc.'s Motion for Extension that we are serving upon you as counsel for Respondent. Thank you.

## Jessica McDonald

*[Paralegal]*

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# ROSEN | HAGOOD

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**Feb 22 2023**

**SC Court of Appeals**

February 22, 2023

**VIA EMAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Chandler Construction Services, Inc. v. Bellsouth Telecommunication, LLC d/b/a  
AT&T South Carolina  
Appellate Court Case No.: 2022-001170

Dear Ms. Kitchings:

Enclosed please find Appellant Chandler Construction Services, Inc.'s Motion for Extension to file its Reply brief in the above referenced matter which is currently due on March 9, 2023. The new deadline with the extension would be April 7, 2023. This is Appellant's first request for an extension.

The filing fee in the amount of \$50.00 is being mailed to the Court. Thank you for your assistance with this matter.

Very truly yours,

*s/ Elizabeth F. Nicholson*

Elizabeth F. Nicholson

EFN/jbm

Cc: A. Mattison Bogan, Esq.  
Jeffrey M. Butler, Esq.