

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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

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JUL 10 2013

S.C. Supreme Court

On Certiorari to the Supreme Court of South Carolina
Opinion No. 4617 (S.C. Ct. App. filed September 9, 2009)

MOTION FOR EXTENSION AND TO REPLY OUT OF TIME

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 Representatives for the Estate of Kenneth O. Poch and Julius Poch.....Petitioners,

v .

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

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of whom Bayshore Concrete Products/South Carolina, Inc.

Bayshore Concrete Products Corporation are theRespondents.

and

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

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

Pursuant to Rule 240 of the South Carolina Appellate Court Rules, the undersigned attorney, counsel for the Respondents, files this motion for an extension of the deadline for serving and filing its Reply to Petitioner's Response In Opposition to Respondent's Motion to Supplement the Record on Appeal. The Petitioners' counsel, Rob Varnado, has consented to this extension. This Reply was due on July 2, 2013. We are requesting an extension through July 15, 2013.

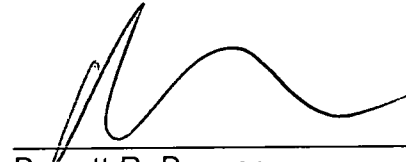
The grounds for this motion are 1) Respondent's counsel received the Petitioner's Response while on family vacation for his July 3, 2013, birthday and the July 4, 2013,

holiday, and needs additional time to research factual and legal issues raised in Petitioner's Response, and 2) no party would be prejudiced by the grant of this extension, as Petitioners have graciously consented to the extension.

Respondents respectfully request that this Court hold any briefing time in abeyance pending the consideration of this motion.

Respondents have conferred with counsel for the Petitioners, who consent to the requested relief.

CLAWSON AND STAUBES, LLC

A handwritten signature in black ink, appearing to read 'Barrett R. Brewer', is written over a horizontal line.

Barrett R. Brewer
126 Seven Farms Drive, Suite 200
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(843) 577-2026

Attorney for the Respondents

Charleston, South Carolina
July 9, 2013

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CERTIFICATE OF SERVICE
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I certify that I have served the Motion for Extension on the Clerk of Supreme Court and on Counsel for the Petitioners by serving copies of the same via U.S. Mail on July 9, 2013 to the following:

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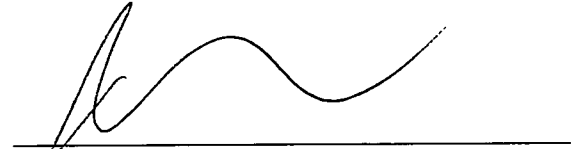
and

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Charleston, South Carolina
July 9, 2013