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**RECEIVED**

**Dec 14 2023**

**SC Court of Appeals**

December 14, 2023

**Via E-Mail**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Flatiron-Zachry v. Stantec Consulting Services, Inc.  
Appellate Case No. 2023-001178  
Our File No. 080177/01500

Dear Ms. Kitchings:

Appellant Flatiron-Zachry, a Joint Venture (“Appellant”) respectfully requests a thirty (30) day extension of time to file its initial brief of appellant and designation of matter. This is Appellant’s second request for an extension of these deadlines. The request is premised on a recent unanticipated family medical emergency for the undersigned, numerous other deadlines and work obligations in other matters, preplanned business travel, and the upcoming holiday season. The undersigned has consulted with counsel for Respondent who consents to this request.

Per the Court’s Order granting Appellant’s initial extension request, Appellant’s current deadline is January 12, 2024. If granted, the new deadline for Appellant’s initial brief and designation will be **February 12, 2024**.

A check in the amount of \$50.00 for the required filing fee will be sent via separate cover. Thank you for your consideration of this request.

With kind regards, I remain

December 14, 2023  
Page 2

Very truly yours,

/s/ Blake T. Williams

Blake T. Williams

BTW:btw

cc: Brannon J. Arnold, Esquire  
William C. Hoffman, Jr., Esquire  
Ross D. Ginsberg, Esquire  
Matthew E. Cox, Esquire  
C. Mitchell Brown, Esquire

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**Dec 14 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas  
Letitia H. Verdin, Circuit Court Judge

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Appellate Case No. 2023-001178  
Case No. 2018-CP-23-04740

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Flatiron-Zachry, a Joint Venture,

Appellant,

v.

Civil Engineering Consulting Services, Inc. c/b/a Civil  
Engineering Consultant Services, Inc.; ECS Southeast,  
LLP f/k/a ECS Carolinas, LLP; Mead and Hunt, Inc.;  
Stantec Consulting Services, Inc.; and T.Y. Lin  
International,

Defendants,

Of which Stantec Consulting Services, Inc. is the

Respondent.

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**PROOF OF SERVICE**

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I, the undersigned Administrative Assistant, of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Flatiron-Zachry, a Joint Venture, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified, pursuant to the Supreme Court Order 2022-05-06-04, and a copy of that electronic mail is attached to this certificate.

Pleading(s): Appellant Flatiron-Zachry's letter requesting second extension to file its initial brief of appellant and designation of matter

Served: **Via E-Mail**

William Christopher Hoffman Jr., Esquire  
Hoffman Law Offices, LLC  
2651 Buckboard Road  
Birmingham, AL 35244  
[Will.hoffman@law.ua.edu](mailto:Will.hoffman@law.ua.edu)

Brannon J. Arnold, Esquire  
Ross D. Ginsberg, Esquire (admitted *pro hac vice*)  
Ross Bundschuh, Esquire  
Amber E. Tuggle, Esquire  
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*Attorneys for Respondent Stantec Consulting Service, Inc.*

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Charlotte, NC 28217  
[mecox@smithcurrie.com](mailto:mecox@smithcurrie.com)

*Attorney for Appellant Flatiron-Zachry, a Joint Venture*



Eileen Hindman  
Administrative Assistant

12/14, 2023

## Eileen Hindman

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**From:** Eileen Hindman  
**Sent:** Thursday, December 14, 2023 3:09 PM  
**To:** Will.hoffman@law.ua.edu; barnold@wwhgd.com; rginsberg@wwhgd.com; RBundschuh@wwhgd.com; atuggle@wwhgd.com; HJohnson@wwhgd.com; mecox@smithcurrie.com; Blake Williams; Mitch Brown  
**Subject:** Flatiron-Zachry v. Stantec Consulting Services, Inc. - Appellate Case No. 2023-001178  
**Attachments:** 2023.12.14 BTW letter to COA requesting extension (Flatiron).pdf; 2023.12.14 Proof of Service (Flatiron).pdf

Good afternoon,

Attached for service upon you in the above matter, please find Appellant Flatiron-Zachry's letter requesting extension, and Proof of Service.

Thank you,



EILEEN HINDMAN SENIOR ADMINISTRATIVE ASSISTANT  
eileen.hindman@nelsonmullins.com

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