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**RECEIVED**

**Apr 11 2024**

**SC Court of Appeals**

April 11, 2024

**Via Electronic Filing**

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

Re: *Tibbs v. Asbestos Corporation Limited*  
Appellate Case No. 2023-002006  
First Extension Request for Response to Motion

Dear Ms. Kitchings:

While we have never before encountered an objection to a simple request for a 10-day extension, we feel compelled to briefly reply by rejecting out of hand the Respondent's baseless suggestion that our clients' request for an additional week and a half to prepare an opposition memorandum is "an attempt to further delay the case."

We certainly did not make any such arguments or suggestions when the Respondent sought a longer extension earlier in this appeal, and our clients are not seeking any "delay [in] the case." In fact, our clients took the extraordinary step of filing and serving their opening brief and designation of matter concurrently with their notice of appeal to avoid any delays. This kind of *ad hominem* attack and assignment of bad motives for a routine, modest extension request is unjustifiable, and the Court should not endorse it.

Best regards,

/s/ M. Todd Carroll

cc: Counsel for Respondent (via email)