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Aug 05 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE DORCHESTER COUNTY
Court of Common Pleas

Diane S. Goodstein, Circuit Court Judge

Appellate Case No. 2024-000698

AJP Solutions, LLC

Respondent,

v.

Clark Construction, Inc., of Mississippi

Appellant.

MOTION & REQUEST FOR EXTENSION OF TIME TO SERVE AND FILE
RESPONDENT'S INITIAL BRIEF & DESIGNATION OF MATTER

TAKE NOTICE, that the below-signed counsel for the Respondent AJP Solutions, LLC, herein request an extension of time to file its Initial Brief and Designation of Matter in this appeal, which are currently due by August 7, 2024. This is Respondent's second request for extension and being based upon the following:

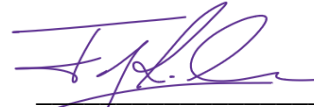
THAT the below-signed only entered an appearance in this matter on July 5, 2024, and previously established obligations have necessitated the need for addition to time understand the proceedings below and to serve and file the Respondent's Initial Brief in this matter.

THEREFORE, Respondent respectfully requests this Court grant the instant extension, making Respondent's Initial Brief and Designation due on or before September 7, 2024.

[signature to follow]

Respectfully submitted,

THURMOND KIRCHNER & TIMBES, P.A.



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Attorney for Respondents

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PROOF OF SERVICE

I, hereby certify that the enclosed was served on the parties stated below by emailing a copy of the enclosed document(s) to opposing counsel:

Bryan Kelley, Esq
Elmore Goldsmith Kelley and DeHoll, PA
bkelly@elmoregoldsmith.com

This 5th day of August, 2024.

THURMOND KIRCHNER & TIMBES, P.A.

BY: s/TJ RODE
Thomas J. Rode