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Oct 14 2024

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Circuit Court Judge and Master-In-Equity

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Appellate Case No.: 2024-000753

Case No.: 2019-CP-10-1108

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Balfour Beatty Construction, LLC, Appellant,

v.

Library Associates, LLC; and Metropolitan Life Insurance Company, a New York Corporation,  
Defendants,

And

Library Associates, LLC, Third-Party Plaintiff,

v.

Lithko Contracting, LLC, Guy M. Beaty, Inc., Bernard MMC, LLC, Gulf Stream Construction Company, Inc., Precision Walls, Inc., Palmetto Automatic Sprinkler Company, Inc., Cook & Boardman, LLC, Strong Tower Construction, LLC d/b/a Koch Corporation, Watson Electrical Construction Co., LLC, Trimark Foodcraft, LLC, Pleasant Places, Inc., David Allen Company, Inc., Premier Exteriors, LLC, Warco Construction, Inc., Old North State Masonry, LLC, Tom Rochester & Associates d/b/a Southeastern Architectural Systems, Forton Company, LLC, Low Country Case & Millwork, Inc., Quantum Coatings, LLC, Balfour Beatty Construction Group, Inc., Third-Party Defendants.

Of which Strong Tower Construction, LLC d/b/a Koch Corporation and Watson Electrical Construction Co., LLC are the Respondents.

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**CERTAIN RESPONDENT'S MOTION FOR EXTENSION OF TIME TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER**

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Based on work schedule of counsel and impacts on counsel caused by Hurricane Helene, Respondent Strong Tower Construction, LLC d/b/a Koch Corporation respectfully requests an Order extending its time to file an initial brief and designation of matter for thirty days. This is the Respondent's first motion requesting an extension of time to file its initial brief and designation of matter.

Respondent respectfully requests until and including November 25, 2024, to file its initial brief and designation of matter.

WHITFIELD-CARGILE LAW, PLLC

s/Samuel M. Wheeler

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*Attorney for Strong Tower Construction, LLC d/b/a  
Koch Corporation*

October 14, 2024  
Brevard, North Carolina

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Of which Strong Tower Construction, LLC d/b/a Koch Corporation and Watson Electrical Construction Co., LLC are the Respondents.

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**PROOF OF SERVICE**

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I certify that, on the date indicated below, I served the Certain Respondent's Motion for Extension of Time to File Initial Brief and Designation of Matter via email on the following:

Don R. Terry, Esq.  
Steele B. Windle, III, Esq.  
[dterry@smithterrylaw.com](mailto:dterry@smithterrylaw.com)  
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*Attorneys for Watson Electrical Construction Co., LLC*

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*Attorneys for the Appellant*

WHITFIELD-CARGILE LAW, PLLC

s/Samuel M. Wheeler

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*Attorney for Strong Tower Construction, LLC d/b/a  
Koch Corporation*

October 14, 2024  
Brevard, North Carolina

# Whitfield-Cargile Law, PLLC

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October 14, 2024

**Via U.S. Mail and Email**

The Honorable Jenny A. Kitchings

Clerk, SC Court of Appeals

1220 Senate Street

Columbia, SC 29201

[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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**SC Court of Appeals**

**Re: Appellate Case No.: 2024-000753**

Dear Ms. Kitchings:

Enclosed is a copy of the Respondent Strong Tower's motion for an extension of time to file its initial brief and designation of matter, proof of service and your \$50 filing fee.

Best regards,

s/Sam Wheeler

Sam Wheeler

cc (via email): All counsel of record