

**RECEIVED**

**Nov 20 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SUMTER COUNTY  
Court of Common Pleas  
R. Kirk Griffin, Circuit Court Judge

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Appellate Case No. 2024-000742

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Jerry Cozby, Plaintiff,

vs.

Kent Huntley Oliver, Thompson Construction Group, Inc., Curtis Ouellette, and Quality Haulers, Inc., Defendants,

of which Kent Huntley Oliver and Thompson Construction Group, Inc. are Respondents.

AND

Dean Alan Arender and Tamala Arender, Appellants,

vs.

Kent Huntley Oliver, Thompson Construction Group, Inc., Curtis Kent Ouellette, and DMX Transportation Services, Inc., Defendants,

of which Kent Huntley Oliver and Thompson Construction Group, Inc. are Respondents.

AND

Kent Huntley Oliver, Respondent,

vs.

Curtis Kent Ouellette, Quality Haulers, Inc., Dean Alan Arender, US XPRESS Leasing, Inc., and US XPRESS, Inc., Defendants,

of which Dean Alan Arender, US XPRESS Leasing, Inc., and US XPRESS, Inc. are Appellants.

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**MOTION FOR EXTENSION**

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Respondents Kent Huntley Oliver and Thompson Construction Group, Inc. (“Respondents”) respectfully request a thirty (30) day extension of time to file their Initial Brief and Designation of Matter, which are currently due on or before November 25, 2024. This is Respondents’ first request for an extension of these deadlines. Respondents request the extension based on their counsel’s work obligations in other matters. If the Court grants the requested extension, the new deadline for Respondents’ Initial Brief and Designation of Matter will be December 25, 2024.<sup>1</sup> Counsel for Appellants consent to the requested extension.

Respectfully submitted,

**SMITH | ROBINSON**  
**Smith Robinson Holler DuBose and Morgan, LLC**

*s/ Frederick N. Hanna, Jr.*

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*Attorneys for Respondents*

Sumter, South Carolina

November 20, 2024

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<sup>1</sup> Counsel will serve and file the Initial Brief and Designation of Matter in advance of the Christmas holiday.

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vs.

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of which Dean Alan Arender, US XPRESS Leasing, Inc., and US XPRESS, Inc. are Appellants.

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**PROOF OF SERVICE**

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I, the undersigned employee of Smith Robinson Holler DuBose and Morgan, LLC, certify that a true copy of Respondents Kent Huntley Oliver and Thompson Construction Group, Inc.'s

Motion for Extension in this case has been served on the following, this 20<sup>th</sup> of November, 2024, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the May 6, 2022 Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447).

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Jennifer Lisandreli

November 20, 2024

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November 20, 2024

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**Nov 20 2024**

**SC Court of Appeals**

**Via Email and Mail**

Ms. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Jerry Cozby, Plaintiff vs. Kent Huntley Oliver, Thompson Construction Group, Inc., Curtis Ouellette, and Quality Haulers, Inc., Defendants, of which Kent Huntley Oliver and Thompson Construction Group, Inc. are Respondents AND

Dean Alan Arender and Tamala Arender, Appellants vs. Kent Huntley Oliver, Thompson Construction Group, Inc., Curtis Kent Ouellette, and DMX Transportation Services, Inc., Defendants, of which Kent Huntley Oliver and Thompson Construction Group, Inc. are Respondents AND

Kent Huntley Oliver, Respondent, vs. Curtis Kent Ouellette, Quality Haulers, Inc., Dean Alan Arender, US XPRESS Leasing, Inc., and US XPRESS, Inc., Defendants, of which Dean Alan Arender, US XPRESS Leasing, Inc., and US XPRESS, Inc. are Appellants.

Appellate Case No.: 2024-000742  
SR File No.: 4700-0006

Dear Ms. Kitchings:

Please find enclosed Respondents Kent Huntley Oliver and Thompson Construction Group, Inc.'s Motion for Extension for filing with your office. The \$50.00 motion fee check will be mailed to the Court under separate cover.

Very truly yours,

A handwritten signature in black ink, appearing to read "Frederick N. Hanna, Jr.", with a long horizontal flourish extending to the right.

Frederick N. Hanna, Jr.

FNHjr/jll  
Enclosures

cc: Jacob Born, Esquire  
James Sproat, Esquire  
Marshall C. Crane, Esquire  
Mark S. Barrow, Esquire  
Madison K. Kea, Esquire  
Justin Arenas, Esquire  
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