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Nov 22 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

COMES NOW, counsel for Respondent who, for the reasons stated herein requests an extension of time to file its Initial Brief and Designation of Matter in this appeal, which are currently due by Monday, November 25, 2024. This is Respondent's third request for extension and being unexpectedly based upon the following:

THAT the below-signed has suffered a death in his family and as a result of this and corresponding out-of-state travel is in need of additional time to file and serve Respondent's Initial Brief and Designation of Matter;

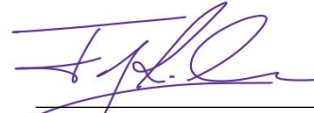
THAT the below-signed has consulted with counsel for the Appellant prior to filing this motion and received no objection; and

THEREFORE, Respondent respectfully requests this Court grant the instant extension, making Respondent's Initial Brief and Designation due on or before December 24, 2024.

[signature to follow]

Respectfully submitted,

THURMOND KIRCHNER & TIMBES, P.A.

A handwritten signature in purple ink, appearing to read 'T. J. Rode', written over a horizontal line.

THOMAS J. RODE, Bar No. 77480

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Attorney for Respondent

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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 22nd day of November, 2024.

THURMOND KIRCHNER & TIMBES, P.A.

BY: s/ *Kaitlyn Nobles*
KAITLYN NOBLES