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November 26, 2024

RECEIVED
Nov 26 2024
SC Court of Appeals

VIA E-MAIL and Hand Delivery:

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: *Balfour Beatty Construction, LLC v. Library Associates, LLC, et al.*
Appellate Case No.: 2024-000753
Trial Court Case No.: 2019-CP-10-01108

Dear Mrs. Kitchings:

Pursuant to 240(a), SCACR, Appellant Balfour Beatty Construction, LLC (“Balfour”) respectfully requests an extension of time of ten (10) days within which to file Balfour’s Initial Reply Brief to Watson Electrical Construction Co., LLC’s Respondent’s Brief.

Watson Electrical Construction Co., LLC served Balfour with its Respondent’s Brief on November 25, 2024. Pursuant to Rule 208(a)(3), SCACR, Balfour’s Initial Reply Brief must be filed with the Court on or before December 5, 2024.

As a result of Balfour’s counsel’s work schedule and the upcoming holiday, good cause exists for granting Balfour’s request for an extension of time within which it may file its Initial Reply Brief. Therefore, Balfour is requesting an order granting an extension of ten (10) days to file its Initial Reply Brief, up to and including Monday, December 16, 2024.

This is Balfour’s first request for an extension of time within which to file its Initial Reply Brief to Watson Electrical Construction Co., LLC’s Respondent’s Brief.

Enclosed herewith is a Proof of Service evidencing service of this request for an extension on Respondents’ Counsel as well as a check in the amount of \$50.00 for the filing fee.

November 26, 2024

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Sincerely,

s/Katon E. Dawson, Jr.

Katon E. Dawson, Jr.

KED/tlc

Enclosures

cc: Via Email Only:

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Nov 26 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2024-000753

Case No.: 2019-CP-10-01108

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.

PROOF OF SERVICE

The undersigned hereby certifies that on November 26, 2024, a copy of **Appellant's Motion for Extension of Time to file Reply Brief** was served on all counsel of record via email containing the above referenced documents to counsels' individual AIS email addresses:

<p>Don R. Terry, Esquire Steele B. Windle, III, Esquire Smith Terry Johnson & Windle 150 Milestone Way, Suite C Greenville, SC 29615 dterry@smithterrylaw.com awindle@smithterrylaw.com</p> <p><i>Attorneys for Watson Electrical Construction, Co., LLC</i></p>	<p>Samuel M. Wheeler, Esquire Whitfield-Cargile Law, PLLC 23 South Brevard Street, Suite 204 Brevard, NC 28712 sam@whitfieldcargilelaw.com</p> <p>and</p> <p>Steven L. Smith Smith Closser, PA P.O. Box 40578 Charleston, SC 29423 ssmith@scnlaw.com</p> <p><i>Attorneys for Strong Tower Construction, LLC d/b/a Koch Corporation</i></p>
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November 26, 2024
Columbia, South Carolina