

**RECEIVED**

**Jan 08 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

---

Case No. 2022-CP-18-01997

---

AJP Solutions, LLC .....Respondent,

v.

Clark Construction, Inc. of Mississippi, TCABC Real Estate Holdings, LLC,  
and Travelers Casualty and Surety Company of America

of which

Clark Construction, Inc. of Mississippi is the.....Appellant.

---

**MOTION FOR EXTENSION OF TIME**

---

The Appellant respectfully requests that the South Carolina Court of Appeals grant an extension of time for Appellant to file its Reply Brief to Respondent’s Initial Brief. Counsel for the Appellant is in the midst of litigating numerous other matters. Along with the additional demands of Counsel on other matters, Counsel is requesting this extension to fully review and adequately brief the issues raised by Respondent in its Initial Brief. The current deadline for Appellant to File its Reply Brief is January 16, 2025. Appellant respectfully requests that the time to file its Reply Brief be extended an additional eleven (11) days making the Reply Brief due on Monday, January 27, 2025. This is Appellant’s first request for an extension of time.

s/Bryan P. Kelley  
Bryan P. Kelley (S.C. Bar No. 76062)  
Katherine S. Elmore (S.C. Bar No. 102826)  
H. Drennan Quattlebaum (S.C. Bar No. 106418)  
Elmore Goldsmith Kelley & deHoll, P.A.  
19 Blair Street (29607)  
Post Office Box 1887  
Greenville, South Carolina 29602  
Telephone: (864) 225- 9500  
Facsimile: (864) 255-9505  
bkelley@elmoregoldsmith.com  
kelmore@elmoregoldsmith.com  
dquattlebaum@elmoregoldsmith.com

*Counsel for Appellant Clark Construction, Inc. of  
Mississippi*

January 8, 2025  
Greenville, South Carolina

RECEIVED

Jan 08 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

Court of Common Pleas Case No. 2022-CP-18-01997  
Appellate Court Case No. 2024-000698

AJP Solutions, LLC, .....Respondent,

v.

Clark Construction, Inc. of Mississippi, TCABC Real Estate Holdings,  
LLC, and Travelers Casualty and Surety Company of America, Defendants,

of which

Clark Construction, Inc. of Mississippi is the.....Appellant.

**PROOF OF SERVICE**

I certify that on this date, January 8, 2025, I filed the **Appellant’s Motion for Extension of Time** with the South Carolina Court of Appeals via electronic filing and U.S. mail, and served a copy on Respondent via e-mail, pursuant to The Supreme Court of South Carolina’s Amended Order, dated April 24, 2024, to the attorneys of record as follows:

*(Addresses and Signature Page Follow)*

South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina  
ctappfilings@sccourts.org

Thomas J. Rode  
Thurmond Kirchner & Timbes, P.A.  
15 Middle Atlantic Wharf  
Charleston, South Carolina 29401  
Thomas@tktlawyers.com  
*Counsel for Respondent*

Eliza Hutto Cantwell  
Cantwell Law Firm, LLC  
Post Office Box 600  
Charleston, South Carolina 29402  
Eliza@cantwelllawfirm.org  
*Counsel for Respondent*

Joshua P. Cantwell  
Poulin, Willey, Anastapoulo, LLC  
32 Ann Street  
Charleston, South Carolina 29403  
Josh.cantwell@poulinwilley.com  
*Counsel for Respondent*

/s/Bryan P. Kelley  
Bryan P. Kelley (S.C. Bar No. 76062)  
H. Drennan Quattlebaum (S.C. Bar No. 106418)  
Elmore Goldsmith Kelley & deHoll, P.A.  
19 Blair Street (29607)  
Post Office Box 1887  
Greenville, South Carolina 29602  
Telephone: (864) 225- 9500  
Facsimile: (864) 255-9505  
bkelley@elmoregoldsmith.com  
dquattlebaum@elmoregoldsmith.com

*Counsel for Appellant*

January 8, 2025  
Greenville, South Carolina

January 8, 2025

**Via US Post and Electronic Mail**

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

Re: *AJP Solutions, LLC v. Clark Construction, Inc. of Mississippi*  
Appellate Case No: 2024-000698

Dear Ms. Kitchings:

In connection with the above-referenced case, please find a copy of Appellant's Motion for Extension of Time to file its Reply Brief to Respondent's Initial Brief. Also enclosed is our firm check for \$50.00 for the filing fee and Proof of Service of the same.

Thank you for your attention.

Very truly yours,

ELMORE GOLDSMITH KELLEY & DEHOLL, P.A.



Katharine O. Spooner, CP  
Certified Paralegal to Bryan P. Kelley and  
H. Drennan Quattlebaum

/kos  
Enclosures

cc *Thomas J. Rode (via email only Thomas@tklawyers.com)*  
*Eliza Hutto Cantwell (via email only Eliza@cantwelllawfirm.org)*  
*Joshua P. Cantwell (via email only Josh.cantwell@poulinwilley.com)*

ELMORE GOLDSMITH KELLEY & DEHOLL, P.A.