

**RECEIVED**

**Jan 30 2025**

**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 FOURTH EXTENSION OF TIME TO FILE  
INITIAL BRIEF AND DESIGNATION OF MATTER**

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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 fourth motion requesting an extension of time to file its initial brief and designation of matter. Barring extenuating circumstances, this Respondent does not intend to file further motions for extensions. Counsel for this Respondent has had a particularly busy few months between practicing in North Carolina and South Carolina.

Respondent respectfully requests until and including March 7, 2025, 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*

January 30, 2025  
Brevard, North Carolina

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**In the Court of Appeals**

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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 Fourth 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)  
[awindle@smithterrylaw.com](mailto:awindle@smithterrylaw.com)

*Attorneys for Watson Electrical Construction Co., LLC*

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*Attorneys for the Appellant*

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s/Samuel M. Wheeler

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

January 30, 2025  
Brevard, North Carolina

# Whitfield-Cargile Law, PLLC

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January 30, 2025

**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)

**RECEIVED**

**Jan 30 2025**

**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