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Mar 26 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Hon. G.D. Morgan, Jr., Circuit Court Judge

Case No. 2021-CP-30-00473
Appellate Case No. 2024-001974

A.R. Foods, Inc.,

Appellant.

v.

Carolina South Shore Construction, Inc.,

Respondent.

MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT’S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Respondent Carolina South Shore Construction, Inc. (hereinafter “South Shore Construction”), by and through its undersigned counsel, hereby moves the Court of Appeals pursuant to Rules 240(a), SCACR, and 263(b), SCACR, for a thirty (30) day extension of time in which to serve and file Respondent’s Initial Brief and its Designation of Matter To be Included in the Record of Appeal. South Shore Construction requests additional time to file a response because counsel who was primarily handling this file has left the firm. Counsel for Appellant has consented to this request. While counsel is working diligently to prepare Respondent’s Initial Brief additional time is necessary due to Respondent’s counsel leaving the firm.

Respectfully submitted,

s/Michelle N. Endemann

James P. Walsh (SC Bar No.: 15180)
Michelle N. Endemann (SC Bar No.: 79894)
Clarkson, Walsh & Coulter, P.A.
P.O. Box 6728
Greenville, SC 29606
(864) 232-4400 Phone
(864) 235-4399 Fax
Jim.walsh@clarksonwalsh.com
Michelle.Endemann@clarksonwalsh.com
*Attorneys for Respondent, Carolina South Shore
Construction, Inc.*

March 26, 2025

Other Counsel of Record:

John T. Crawford (SC Bar No.: 69682)
Kathryn L. Harden (Sc Bar No.: 103217)
Kenison, Dudley & Crawford, LLC
325 West McBee Avenue, Suite 301
Greenville, SC 29601
(864) 242-4899
crawford@conlaw.com
harden@conlaw.com
Attorneys for Appellant

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PROOF OF SERVICE

The undersigned does hereby certify that on March 26, 2025, a copy of Respondent's Motion for Extension of Time to File Initial Brief and Designations of Record was served by email on all counsel of record as follows. A copy of the sent email is enclosed as **Exhibit 1** with this Proof of Service.

[SIGNATURE ON FOLLOWING PAGE]

Respectfully submitted,

s/Michelle N. Endemann

James P. Walsh (SC Bar No.: 15180)
Michelle N. Endemann (SC Bar No.: 79894)
Clarkson, Walsh & Coulter, P.A.
P.O. Box 6728
Greenville, SC 29606
(864) 232-4400 Phone
(864) 235-4399 Fax
Jim.walsh@clarksonwalsh.com
Michelle.Endemann@clarksonwalsh.com
*Attorneys for Respondent, Carolina South Shore
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Kathryn L. Harden (Sc Bar No.: 103217)
Kenison, Dudley & Crawford, LLC
325 West McBee Avenue, Suite 301
Greenville, SC 29601
(864) 242-4899
crawford@conlaw.com
harden@conlaw.com
Attorneys for Appellant

From: Kathryn Harden <harden@conlaw.com>
Sent: Wednesday, March 26, 2025 11:04 AM
To: Katherine Aiken; John Crawford
Cc: Michelle Endemann; Tina Bair; Natascha Genc; Cara Smith
Subject: Re: A.R. Foods v. Carolina South Shore Construction, Inc.

Categories: Danielle Not Copied, Isabella Not Copied

Katherine,

A.R. Foods consents. Additionally, please include Cara Smith and Natascha Genc in future communications, they have been cc'd for convenience. Thanks!

****PLEASE NOTE THAT OUR GREENVILLE OFFICE IS NOW LOCATED AT 325 W. MCBEE AVENUE, SUITE 301, GREENVILLE, SC 29601.****

Kathryn L. Harden
Attorney
KENISON, DUDLEY & CRAWFORD, LLC
325 W. McBee Avenue, Suite 301
Greenville, SC 29601
Email: harden@conlaw.com
Main: (864) 242-4899
Direct: (864)501-2571
Website: www.conlaw.com

This email contains information that may be confidential and/or privileged. If you are not the intended recipient, or the employee or agent authorized to receive for the intended recipient, you may not copy, disclose or use any contents in this email. If you have received this email in error, please immediately notify the sender at Kenison, Dudley & Crawford, LLC by replying to this email and delete the original and reply emails. Thank you.

From: Katherine Aiken <katherine.aiken@clarksonwalsh.com>
Sent: Wednesday, March 26, 2025 9:59 AM
To: John Crawford <crawford@conlaw.com>; Kathryn Harden <harden@conlaw.com>
Cc: Michelle Endemann <michelle.endemann@clarksonwalsh.com>; Tina Bair <tina.bair@clarksonwalsh.com>
Subject: A.R. Foods v. Carolina South Shore Construction, Inc.

Some people who received this message don't often get email from katherine.aiken@clarksonwalsh.com.
[Learn why this is important](#)

John and Kathryn,

Please find attached for your review Respondent's Motion for an Extension. We are asking for an additional 30 days and would like to know if you will consent to this request. John Harjehausen has left the firm and we are trying to get up to speed. Thanks for your consideration and we look forward to hearing back from you.

Thank you,

Katherine Aiken
Paralegal to Michelle N. Endemann



CLARKSON | WALSH | COULTER

497 St. Andrews Blvd. | Charleston, SC 29407
Office/Direct: (843) 973-8154 | Fax: 864.235.4399

Visit our website at
www.clarksonwalsh.com

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