

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
James C. Williams, Jr., Special Referee

Case No. 2010-CP-40-8621

C.R. Meyer and Sons Company, Plaintiff,

v.

Custom Mechanical CSRA, LLC is Respondent,

Custom Mechanical
CSRA, LLC, Third-party Plaintiff/Respondent,

v.

Plumbers & Steam Fitters Local #150 Health and Welfare Fund; Plumbers & Steam Fitters Local #150 Pension Fund; Plumbers & Steam Fitters Local #150 Annuity Fund, and Jackie K. Nordeen, Jr. And Patrick H.F. Smith, IV, as Trustees of these Funds; Plumbers & Steam Fitters Local #150 Vacation Fund and Patrick H. F. Smith, IV and Joseph L. Dozier, as Trustees of this Fund; Augusta Joint Apprenticeship and Journeymen Training Committee, and Patrick H.F. Smith, IV and Charles I. Hardigree, as Trustees of this Fund; Trustees of Southern Iron Workers Pension Fund; Trustees of Southeastern Iron Workers Healthcare Plan; Trustees of Southeastern Iron Workers #709 Joint Apprenticeship and Training committee and Local #709, International Association Of Bridge, Structural, Ornamental and Reinforcing Iron Workers; Southeastern Carpenters and Millwrights Health Trust, Southeastern Carpenters and Millwrights Pension

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1st (60 days)
9-20-13
11-19-13

Trust, Larry Phillips and J. Kirk Malone, as Trustees of these Funds; Ferguson Enterprises, Inc.; Presidential Financial Corporation; Norton Welding Supply, Inc.; United Rentals (North America), Inc.; Daniel R. Friedmann; Tony Hall; Timothy R. Hall, Jr.; Ralph D. Black; Thomas Brittingham; Arthur C. Carlson; Leonard Wade Cliett; Christopher Cullipher; David W. Cullipher; Joseph A. Doyle, Jr.; Charles R. Ellzey; Brian Field; Clayton W. Googe, Jr.; Martin Granger; William R. Giffin, Jr.; Jack E. Hegler; George G. Lever; Matt Lever; Ernest H. Lewis, III; the Estate of William R. McFerrin by and through its duly-appointed Executrix, Nancy McFerrin; Daniel Nichols; Kinda Phommachanh; Raleigh B. Roye; Nicholas Stewart; Timothy P. Stock; James Waltemath; Al Tiska; Al Carpenter; Bruce Pollock, Jr.; and, Security Federal Bank, Third-party Defendants,

Presidential Financial and Security
Federal Bank, Counterclaim and Crossclaim Respondents,

v.

Plumbers & Steam Fitters Local #150 Health and Welfare Fund; Plumbers & Steam Fitters Local #150 Pension Fund; Plumbers & Steam Fitters Local #150 Annuity Fund, and Jackie K. Nordeen, Jr. and Patrick H.F. Smith, IV, as Trustees of these Funds; Plumbers & Steam Fitters Local #150 Vacation Fund, and Patrick H. F. Smith, IV and Joseph L. Dozier, as Trustees of this Fund; Augusta Joint Apprenticeship and Journeymen Training Committee, and Patrick H.F. Smith, IV and Charles I. Hardigree, as Trustees of this Fund; Trustees of Southern Iron Workers Pension Fund; Trustees of Southeastern Iron Workers Healthcare Plan; Trustees of Southeastern Iron Workers #709; Joint Apprenticeship and Training committee and Local #709, International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers; Southeastern Carpenters and Millwrights Health Trust; Southeastern Carpenters and Millwrights Pension Trust, Larry Phillips and J. Kirk Malone, as Trustees of these Funds; Ferguson Enterprises, Inc.; Norton

Welding Supply, Inc.; United Rentals (North America),
Inc., Third-party Defendants,

and

Daniel R. Friedmann; Tony Hall; Timothy R. Hall, Jr.;
Ralph D. Black; Thomas Brittingham; Arthur C. Carlson;
Leonard Wade Cliett; Christopher Cullipher; David W.
Cullipher; Joseph A. Doyle, Jr.; Charles R. Ellzey;
Brian Field; Clayton W. Googe, Jr.; Martin Granger;
William R. Giffin, Jr.; Jack E. Hegler; George G. Lever;
Matt Lever; Ernest H. Lewis, III; the Estate of William
R. McFerrin by and through its duly-appointed Executrix,
Nancy McFerrin; Daniel Nichols; Kinda Phommachanh;
Raleigh B. Roye; Nicholas Stewart; Timothy P. Stock;
James Waltemath; AI Tiska; AI Carpenter; and Bruce
Pollock, Jr., Counterclaim and Crossclaim Appellants,

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Of Whom

Daniel R. Friedmann; Tony Hall; Timothy R. Hall, Jr.;
Ralph D. Black; Thomas Brittingham; Arthur C. Carlson;
Leonard Wade Cliett; Christopher Cullipher; David W.
Cullipher; Joseph A. Doyle, Jr.; Charles R. Ellzey;
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Raleigh B. Roye; Nicholas Stewart; Timothy P. Stock;
James Waltemath; AI Tiska; AI Carpenter; and Bruce
Pollock, Jr. are Appellants.

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MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellants request a 60-day extension of the
deadline for filing and serving their initial brief and designation of matter to be included
in the record on appeal in this case. The current deadline is September 20, 2013.

This is the first request for an extension of this deadline.

September 19, 2013

Respectfully submitted,



John S. Nichols, Bar # 4210

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Attorneys for Appellants

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and Charles I. Hardigree, as Trustees of this Fund;
Trustees of Southern Iron Workers Pension Fund;
Trustees of Southeastern Iron Workers Healthcare Plan;
Trustees of Southeastern Iron Workers #709 Joint
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and

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Raleigh B. Roye; Nicholas Stewart; Timothy P. Stock;
James Waltemath; AI Tiska; AI Carpenter; and Bruce
Pollock, Jr., Counterclaim and Crossclaim Appellants,

Of Whom

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Ralph D. Black; Thomas Brittingham; Arthur C. Carlson;
Leonard Wade Cliett; Christopher Cullipher; David W.
Cullipher; Joseph A. Doyle, Jr.; Charles R. Ellzey;
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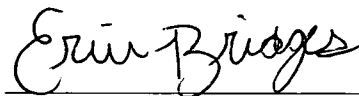
The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondents with a copy of the *Notice of Appearance* and *Motion for
Extension* by mailing copies of the same by United States Mail with first class postage
prepaid to the following addresses:

Francis M. Mack, Esquire
RICHARDSON PLOWDEN CARPENTER & ROBINSON, PA
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Columbia, SC 29201

Robert L. Buchanan, Jr., Esquire
BUCHANAN LAW OFFICE, PA
P.O. Box 463
Aiken, SC 29802-0463

September 19, 2013
Columbia, South Carolina



Erin Bridges
Paralegal
BLUESTEIN, NICHOLS, THOMPSON
& DELGADO, LLC



Margaret Miles Bluestein
John Shannon Nichols
Stacy Elizabeth Thompson
John Dennis Delgado
Allison Paige Sullivan
Ashley Trout Thompson
Blake Alexander Hewitt
Kenneth Henry Dojaquez
John Clarke Newton

OF COUNSEL
O. Eugene Powell, Jr.

September 19, 2013

VIA HAND DELIVERY

Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: C.R. Meyer and Sons Company v. Custom Mechanical CSRA, LLC v. Presidential
Financial and Security Federal Bank v. Daniel R. Friedmann, et. al.
Case No.: 2010-CP-40-8621

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of a *Notice of Appearance* in regards to this case. Also, please find the original and seven (7) copies of a *Motion for Extension*. I have also enclosed a proof of service of these documents on counsel of record and a \$25.00 check for filing this motion. Please return the additional filed copies to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges
Paralegal to John S. Nichols
BLUESTEIN, NICHOLS, THOMPSON &
DELGADO, LLC

/emb

Enclosures

cc: Nekki Shutt, Esquire
Francis M. Mack, Esquire
John T. Lay, Jr., Esquire
Robert L. Buchanan, Jr., Esquire