

RECEIVED
Sep 04 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable David P. Caraker, Circuit Court Judge

Appellate Case No. 2025-001074

Ryan Cobb, Malon Cobb, Cobb Trucking, LLC, and Brandy Cobb,.....Respondents,

v.

David Alan Bigelow, Heritage Hauling, Inc., Boggs Contracting, Inc., and Safe Shield, LLC,
Defendants,

of which Boggs Contracting, Inc. is theAppellant.

RESPONDENTS' FIRST CONSENT MOTION FOR EXTENSION OF TIME

Respondents Ryan Cobb, Malon Cobb, Cobb Trucking, LLC, and Brandy Cobb, move the Court for a first extension of thirty days to file the Initial Brief of Respondent and Designation of Matter for the Record on Appeal. Appellant consents to this request. Respondent's Initial Brief and Designation are currently due on Monday, September 8, 2025. A 30-day extension will make the Initial Brief and Designation due on Wednesday, October 8, 2025.

Respectfully submitted,

September 4, 2025

s/Kathleen C. Barnes
Kathleen C. Barnes, SC Bar No. 78854
kbarnes@barneslawfirmssc.com
BARNES LAW FIRM, LLC
P.O. Box 897
Hampton, South Carolina 29924
Phone: 803-943-4529

JERRY L SPIVEY LAW FIRM

Jerry L. Spivey, Esquire
Jspivey1@ec.rr.com
(admitted Pro Hac Vice)
206 N. 4th Steet, Ste 2
Wilmington, NC 28401

CULBRETH LAW FIRM

Stephen E. Culbreth, Esquire
culbrethlaw@juno.com
(admitted Pro Hac Vice)
PO Box 446
Wilmington, NC 28402

Attorneys for Respondents

EVANS MOORE, LLC

Scott C. Evans, SC Bar No. 77684
scott@evansmoorelaw.com
James B. Moore, III, SC Bar No. 74268
James@evansmoorelaw.com
George W. Bryan, III,
george@evansmoorelaw.com
121 Screven Street
Georgetown, SC 29440

RECEIVED

Sep 04 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

David P. Caraker, Circuit Court Judge

Appellate Case No. 2025-001074

Ryan Cobb, Malon Cobb, Cobb Trucking, LLC, and Brandy Cobb,.....Respondents,

v.

David Alan Bigelow, Heritage Hauling, Inc., Boggs Contracting, Inc., and Safe
Shield, LLC, Defendants,

of which Boggs Contracting, Inc. is the.....Appellant.

PROOF OF SERVICE

The undersigned certifies that a copy of *Respondents' First Consent Motion for Extension
of Time* has been served upon counsel for Appellant and counsel of record via electronic mail at
the email addresses stated below on September 4, 2025.

J.R. Murphy
jrmurphy@murphygrantland.com

Jay Thompson
jay.thompson@murphygrantland.com

Diana August
dmaugust@murphygrantland.com

George W. Bryan, III
george@evansmoorelaw.com

Scott C. Evans
scott@evansmoorelaw.com

James B. Moore, III
james@evansmoorelaw.com

Stephen E. Culbreth
culbrethlaw@juno.com
steveculbreth.lawfirm@gmail.com

Jerry L. Spivey
Jspivey1@ec.rr.com

Curtis L. Ott
cott@gwblawfirm.com

Mary Ashley Martin
mamartin@lmorganmartin.com

L. Morgan Martin
mmartin@lmorganmartin.com

Ryan C. Holt
Rachel A. Bryant
rch@swblaw.com

Kenneth Michael Barfield
mbarfield@barnwell-whaley.com

September 4, 2025

Respectfully submitted,

s/Kathleen C. Barnes
Kathleen C. Barnes, SC Bar # 78854
BARNES LAW FIRM, LLC
P.O. Box 897
Hampton, SC 29924
Phone: 803-943-4529
kbarnes@barneslawfirm.com
Attorney for Respondents

Kathleen C. Barnes
kbarnes@barneslawfirmssc.com



William F. Barnes III
wbarnes@barneslawfirmssc.com

September 4, 2025

Via Email

The Honorable Jenny Abbott Kitchings
Clerk of Court for the Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211
ctappfilings@sccourts.org

RECEIVED
Sep 04 2025
SC Court of Appeals

Re: *Cobb v. Boggs Contracting, Inc.*
Appellate Case No. 2025-001074
Respondent's First Motion for Extension

Dear Mrs. Kitchings:

Attached for electronic filing and service please find

1. Respondent's First Consent Motion for Extension of Time, and
2. Proof of Service.

Please file the documents and return one file-stamped copy to me via email. By electronic copy of this letter, I am serving all counsel of record as stated below. Pursuant to Order 2020-05-29-02, the \$50.00 filing fee is being mailed to the Court within five days of the date of this electronic filing.

Sincerely,

s/Kathleen C. Barnes

Enclosures

cc via email only:

J.R. Murphy
jrmurphy@murphygrantland.com
Diana August
dmaugust@murphygrantland.com
Scott C. Evans
scott@evansmoorelaw.com
Stephen E. Culbreth
steveculbreth.lawfirm@gmail.com

Jay Thompson
jay.thompson@murphygrantland.com
George W. Bryan, III
george@evansmoorelaw.com
James B. Moore, III
james@evansmoorelaw.com
Jerry L. Spivey
Jspivey1@ec.rr.com

Curtis L. Ott
cott@gwblawfirm.com
L. Morgan Martin
mmartin@lmorganmartin.com

Kenneth Michael Barfield
mbarfield@barnwell-whaley.com

Mary Ashley Martin
mamartin@lmorganmartin.com
Ryan C. Holt
Rachel A. Bryant
rch@swblaw.com