

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE LEXINGTON COUNTY COURT OF COMMON PLEAS

Walton J. McLeod, Circuit Court Judge

Case No.: 2022-CP-32-01932

Appellate Case No. 2025-000905

106087

Bundy McDonald, LLC, Appellant,

vs.

WECO River District, LLC, Respondent.

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SC Court of Appeals

APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE ITS
INITIAL REPLY BRIEF

Appellant Bundy McDonald, LLC ("Appellant"), pursuant to Rule 240(a), SCACR, respectfully requests an extension of time of ten (10) days within which to file Appellant's Initial Reply Brief in the above referenced Appeal.

This is Appellant's **SECOND** motion requesting an extension of time to file Appellant's Initial Reply Brief.

The grounds for this motion for extension of time are as follows: Appellant's counsels' work schedule has made it impossible to complete the Initial Reply Brief within the time currently provided. Additionally, Appellant is working to provide a Response to the Respondent's Motion to Certify this Appeal to the South Carolina Supreme Court which is currently due October 6, 2025.

Given the foregoing and notwithstanding Appellant's counsels' best efforts, Appellant respectfully contends that good cause exists for an extension of time to file its Initial Reply Brief.

WHEREFORE, Appellant respectfully requests an order granting an extension of time of ten (10) days within which to file Appellant's Initial Reply Brief up to an including Monday, October 13, 2025.

BUNDY MCDONALD, LLC

s/M. Brent McDonald

W. H. Bundy, Jr., Esq. (SC Bar #1012)

M. Brent McDonald, Esq. (SC Bar #78057)

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Attorneys for Plaintiff/Appellant

October 2, 2025

**THE STATE OF SOUTH CAROLINA
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Walton J. McLeod, Circuit Court Judge
Case No.: 2022-CP-32-01932
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Bundy McDonald, LLC, Appellant,

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PROOF OF SERVICE

The undersigned hereby certifies that on October 2, 2025, a copy of Appellant's **SECOND** Request for an extension of time to file its Initial Reply Brief was served on Respondent's Counsel via email to counsels' individual AIS email addresses as follows:

Attorney for Respondent:

Hank Wall
Bruner, Powell, Wall and Mullins, LLC
P.O. Box 61110
Columbia, SC 29260
hwall@brunerpowell.com

Attorney for Defendant WECO River District, LLC

[Signature Page Follows]

BUNDY MCDONALD, LLC

s/M. Brent McDonald

W. H. Bundy, Jr., Esq. (SC Bar #1012)

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Attorneys for Appellant

October 2, 2025

Bundy McDonald
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October 2, 2025

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Via Email and US Mail

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: Bundy McDonald, LLC v. WECO River District, LLC
Appellate Case No.: 2025-000905

Dear Mrs. Kitchings:

Enclosed on behalf of Appellant Bundy McDonald, LLC (“Appellant”) is Appellant’s Motion and SECOND request for an extension of time, pursuant to Rule 240(a), SCACR, to file Appellant’s Initial Reply Brief in Appellate Case No. 2025-000905.

This request would make Appellant’s Initial Reply Brief to be filed and served on or before **October 13, 2025**.

Enclosed herewith is also a Proof of Service of this Motion for extension of time on Respondent’s Counsel. Also, a filing fee of \$50.00 is enclosed with the copy of this correspondence sent by U.S. Mail. With kindest regards, I remain

Sincerely yours,

s/ M. Brent McDonald

M. Brent McDonald

Enc. (As noted)

cc: **Attorney for Respondent:**

Hank Wall
Bruner, Powell, Wall and Mullins, LLC
P.O. Box 61110

Columbia, SC 29260
hwall@brunerpowell.com

Attorney for Defendant WECO River District, LLC

BUNDY MCDONALD, LLC

ATTORNEYS AT LAW

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FOREVER



The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street,
Columbia, SC 29201

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