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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2024-000788
Case No.: 2019-CP-10-01108

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 Library Associates, LLC is the Respondent.

**RESPONDENT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE ITS
FINAL BRIEF**

Respondent Library Associates, LLC (“Respondent”), pursuant to Rule 240(a), SCACR, respectfully requests an extension of time of twenty (20) days within which to file Respondent’s Final Brief.

This is Respondent’s second motion requesting an extension of time to file Respondent’s Final Brief.

The grounds for this motion for extension of time are as follows: (1) Given the Thanksgiving Holiday and time off for staff and attorneys, the deadline of December 2, 2025 became untenable; (2) Respondent’s counsels’ work schedule has made it impossible to complete the Final Brief within the time currently provided; and (3) There is no prejudice to Appellant.

Given the foregoing and notwithstanding Respondent’s counsels’ best efforts, Respondent respectfully contends that good cause exists for an extension of time to file its Final Brief.

WHEREFORE, Respondent Respectfully requests an order granting an extension of time of twenty (20) days within which to file Respondent’s Final Brief, up to an including Monday, December 22, 2025.

[Signature Page Follows]

BUNDY MCDONALD, LLC

/s M. Brent McDonald

Bundy McDonald, LLC

W.H. Bundy, Jr., Esquire (SC Bar No. 1012)

M. Brent McDonald, Esquire (SC Bar No 78057)

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Attorneys For Library Associates, LLC.

December 2, 2025

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Of which Library Associates, LLC is the Respondent.

PROOF OF SERVICE

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

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1221 Main Street, Suite 1100
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Respectfully,

BUNDY MCDONALD, LLC

/s M. Brent McDonald

Bundy McDonald, LLC

W.H. Bundy, Jr., Esquire (SC Bar No. 1012)

M. Brent McDonald, Esquire (SC Bar No 78057)

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Attorneys For Respondent Library Associates,
LLC

December 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: Balfour Beatty Construction, LLC v. Library Associates, LLC, et al.
Appellate Case No.: 2024-000788

Dear Mrs. Kitchings:

Enclosed herewith is Respondent Library Associates, LLC (“Respondent”) Motion for a **SECOND** extension of time of twenty (20) days within which to file Respondent’s Final Brief in Appellate Case No. 2024-000788.

Also Enclosed herewith is a Proof of Service of this Request for second extension on Appellant’s Counsel. 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: Attorneys for Appellant:

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