

70421

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

RECEIVED

NOV 18 2013

Case No. 2010-CP-40-8621

SC Court of Appeals

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

11-27-13
11-19-13
12-19-13

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; AI Tiska; AI 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; Al Tiska; Al Carpenter; and Bruce
Pollock, Jr., Counterclaim and Crossclaim Appellants,

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; Al Tiska; Al Carpenter; and Bruce
Pollock, Jr. are Appellants.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellants request a 30-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 November 19, 2013.

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

November 18, 2013

Respectfully submitted,



John S. Nichols, Bar # 4210

BLUESTEIN NICHOLS

THOMPSON & DELGADO

Post Office Box 7965

Columbia, SC 29202

(803) 779-7599

(803) 779-8995 (facsimile)

jsnichols@bntdlaw.com

Nekki Shutt, SC Bar #6530

Callison Tighe & Robinson, LLC

Post Office Box 1390

Columbia, SC 29202

(803) 404-6900

(803) 404-6901

Nekkishutt@callisontighe.com

Attorneys for Appellants

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Inc., Third-party Defendants,

and

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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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James Waltemath; Al Tiska; Al Carpenter; and Bruce
Pollock, Jr., Counterclaim and Crossclaim Appellants,

Of Whom

Daniel R. Friedmann; Tony Hall; Timothy R. Hall, Jr.;
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Cullipher; Joseph A. Doyle, Jr.; Charles R. Ellzey;
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Raleigh B. Roye; Nicholas Stewart; Timothy P. Stock;
James Waltemath; Al Tiska; Al Carpenter; and Bruce
Pollock, Jr. are Appellants.

PROOF OF SERVICE

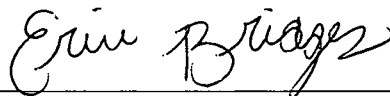
The undersigned hereby certifies that on the date indicated below she served
counsel for the Respondents with a copy of the *Motion for Extension* by mailing copies of
the same by United States Mail with first class postage prepaid to the following
addresses:

Francis M. Mack, Esquire
RICHARDSON PLOWDEN CARPENTER & ROBINSON, PA
1900 Barnwell St.
Columbia, SC 29201

John T. Lay, Jr., Esquire
GALLIVAN WHITE & BOYD, PA
1201 Main Street, Ste. 1200
Columbia, SC 29201

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

November 18, 2013
Columbia, South Carolina



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



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC
ATTORNEYS AT LAW

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.

November 18, 2013

VIA HAND DELIVERY

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

RECEIVED
NOV 18 2013
SC Court of Appeals

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 Tracking No.: 2013-001839

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a *Motion for Extension* in the above referenced matter. I have also enclosed a proof of service of upon counsel of record and a \$25.00 check for filing this motion. Please return the additional filed copy 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