

May 4, 2026

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May 04 2026

SC Court of Appeals

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:

Respondent Library Associates, LLC (“Respondent”) pursuant to Rule 240(a), SCACR, respectfully requests an extension of time of three (3) days within which to file Respondent’s Return to the Order of this Court on April 30, 2026 in Appellate Case No. 2024-000788.

This is Respondent’s **FIRST** request for an extension of time within which to file its Response. Respondent has worked diligently over the past four (4) days to complete the Response, but requires more time. This would make Respondent’s Response required to be filed and served on or before **May 7, 2026**.

Enclosed herewith is a Proof of Service of this Request for extension on Appellant’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,

M. Brent McDonald

Enc. (As noted)

cc: **Attorneys for Appellant:**

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Attorneys for Appellant Balfour Beatty Construction,
LLC

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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.

PROOF OF SERVICE

The undersigned hereby certifies that on May 4, 2026, a copy of Respondent's Request for an extension of time to file its Response to this Court's Order of April 30, 2026 was served on Appellant's Counsel via email to counsels' individual AIS email addresses as follows:

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Respectfully,

BUNDY MCDONALD, LLC

/s M. Brent McDonald

Bundy McDonald, LLC

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