

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
RESPONSE TO THE ORDER OF APRIL 30, 2026**

Respondent Library Associates, LLC (“Respondent”), pursuant to Rule 240(a), SCACR, respectfully requests an extension of time of seven (7) days within which to file Respondent’s Response to the Order of April 30, 2026.

This is Respondent’s second motion requesting an extension of time to file Respondent’s Response to the Order of April 30, 2026.

The grounds for this motion for extension of time are as follows: (1) The incredible task of completing and complying with the Order of April 30, 2026 requires additional time; (2) Respondent’s main counsel necessarily needs to ensure that the Response references to the Record on Appeal are accurate and proper objections have been made; this has made it impossible to complete the Response 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 Response.

WHEREFORE, Respondent Respectfully requests an order granting an extension of time of seven (7) days within which to file Respondent’s Final Brief, up to and including May 14, 2026.

[Signature Page Follows]

BUNDY MCDONALD, LLC

/s M. Brent McDonald

Bundy McDonald, LLC

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May 7, 2026