

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2013-001623

South Carolina Electric & Gas, Co.,.....Respondent

v.

Anson Construction Company,.....Appellant

**RESPONDENT'S MOTION FOR EXTENSION OF TIME TO RESPOND TO  
APPELLANT'S INITIAL BRIEF**

NOW COMES counsel for Respondent, and moves this Honorable Court to grant an extension of time of thirty (30) days beyond the thirty (30) days as made applicable by Rule 208 and 209 of the South Carolina Appellate Court Rules to respond to Appellant's Initial Brief with the Clerk of Appellate Court. Counsel submits as justification for this request that this is Respondent's first request for an extension, and counsel for Appellant consents to this extension.

January 22, 2014



John A. Massalon, Esquire SC Bar #010279  
I. Ryan Neville, Esquire SC Bar # 76513  
WILLS MASSALON & ALLEN LLC  
Post Office Box 859  
Charleston, South Carolina 29402  
(843) 727-1144  
ATTORNEYS FOR RESPONDENT

**RECEIVED**  
JAN 27 2014  
**SC Court of Appeals**

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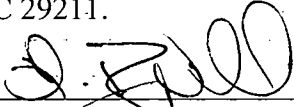
v.

Anson Construction Company,.....Appellant

**PROOF OF SERVICE FOR RESPONDENT'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO APPELLANTS INITIAL BRIEF**

I certify that I served Respondent's Motion for Extension of Time to Respond to Appellants Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on January 22, 2014, addressed to its attorney of record, Everett A. Kendall, II, Esq. & J. Eric Cavanaugh, Esq., 1515 Lady Street, Columbia, SC 29211.

January 22, 2014

  
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# WMA

WILLS MASSALON & ALLEN LLC

97 Broad Street • Charleston, SC 29401 • Post Office Box 859 • Charleston, SC 29402

Phone: 843-727-1144 • Fax: 843-727-7696 • [www.wmalawfirm.net](http://www.wmalawfirm.net)

January 22, 2014

Direct Dial: 843-793-6041

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

RE: South Carolina Electric & Gas Co. vs. Anson Construction Co., Inc.

Case No.: 2011-CP-10-5099

Appellate Case No.: 2013-001623

Our File No.: 19-187

Dear Ms. Kitchings:

Enclosed for filing, please find one (1) original and one (1) copy of the Respondent's Motion for Extension of Time to Respond to Appellant's Initial Brief and Proof of Service for the same. Please file stamp the original and copy, returning a filed copy to me in the enclosed self-addressed, stamped envelope. By way of courtesy copy, I am informing all counsel of record with notice of my communication with the Court. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

WILLS MASSALON & ALLEN LLC



I. Ryan Neville

[rneville@wmalawfirm.net](mailto:rneville@wmalawfirm.net)

IRN:kap

Enclosures

cc: Everett A. Kendall II, Esquire/J. Eric Cavanaugh, Esquire  
John M. Mahon, Jr., Esquire  
Ms. Sandy Kammer

**RECEIVED**

JAN 27 2014

**SC Court of Appeals**