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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

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JUN 10 2015

SC Court of Appeals

Case No. 2012-CP-24-00574
Appellate Case No. 2014-002749

Miller Construction Company, LLC.....Respondent/Appellant

v.

PC Construction of Greenwood, Inc. and Safeco Insurance Company
of America.....Appellants/Respondents

**MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS' INITIAL
BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD**

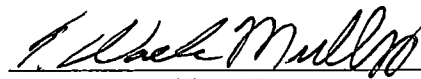
Pursuant to Rule 240(a) SCACR, Appellants/Respondents PC Construction of Greenwood, Inc. and Safeco Insurance Company of America (hereinafter referred to collectively as "PC"), respectfully requests an extension of thirty (30) days to file its Initial Brief and Designation of Matter to be Included in the Record. The current due date is June 10, 2015. The Appellants/Respondents PC respectfully requests the Court to grant an extension of thirty (30) additional days or until July 13, 2015 to serve and file its Initial Brief and Designation of Matter to be Included in the Record.

Due to significant workload and cases pending in Federal and Circuit Court and previously scheduled legal-related events outside of the office, Counsel for

Appellants/Respondents PC needs additional time to properly prepare these documents. Counsel for Appellants/Respondents PC has consulted with Counsel for the Respondent, Miller Construction Company, LLC ("Miller") and Miller consents to the extension.

Accordingly, Appellants/Respondents PC respectfully requests an extension of time in which to file its Initial Brief and Designation of Matter to be Included in the Record until July 13, 2015.

June 10, 2015



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May 8, 2015

MAY 11 2015

E. Wade Mullins, III
Bruner, Powell, Wall & Mullins, LLC
PO Box 61110
Columbia, S.C. 29260

Attention: Mr. Mullins .

RE: Miller Construction Company, LLC vs. PC Construction of Greenwood, Inc.

2012-CP-24-00574

Honorable Eugene C. Griffith, Jr., Judge

350 Pages @ \$3.25 \$1,137.50

Total \$1,137.50

Joy E. Holston

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Miller Construction Company, LLC.....Respondent/Appellant

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of America.....Appellants/Respondents

PROOF OF SERVICE

I, Rita D. DeCarlis, of Bruner, Powell, Wall & Mullins, LLC, attorneys for the Appellants/Respondents, do hereby certify that on this 10th day of June 2015, I served the **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS/RESPONDENTS INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD** upon the attorney of Record for the Respondent/Appellant by depositing a copy of the same in U.S. Mail, first class, postage prepaid and addressed as follows:

David J. Brousseau, Esquire
McIntosh, Sherard, Sullivan & Brousseau
Post Office Box 197
Anderson, South Carolina 29622

Rita D. DeCarlis
Rita D. DeCarlis

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* Of Counsel

**Also Admitted in District of Columbia

AUTHOR'S E-MAIL: WMULLINS@BRUNERPOWELL.COM

June 10, 2015

VIA HAND DELIVERY

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

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JUN 10 2015

SC Court of Appeals

Re: *Miller Construction Company, LLC vs. PC Construction of Greenwood, Inc. and Safeco Insurance Company of America*
Appellate Case No.: 2014-002749
Civil Action No.: 2012-CP-24-00574
Our File Number: 7-931.127

Dear Ms. Kitchings:

On behalf of the Appellants/Respondents in the above referenced matter, I would request a thirty (30) day time extension until Monday, July 13, 2015 to file the Appellants/Respondents PC Construction of Greenwood, Inc. and Safeco Insurance Company of America's Initial Brief and Designation of Matter to be Included in the Record.

I have enclosed the original and six (6) copies of the **MOTION FOR EXTENSION OF TIME TO FILE APPELLANTS/RESPONDENTS INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD**, a check in the amount of \$25.00 and a proof of service of this request on counsel for the Respondent/Appellant.

Thank you for your assistance in this matter. If you have any questions, please do not hesitate to contact me.

With my kindest regards, I am

Sincerely yours,



E. Wade Mullins III

EWM/rdd
Enclosures

cc: David J. Brousseau, Esquire
PC Construction of Greenwood, Inc.