

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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JUL 06 2015

SC Court of Appeals

APPEAL FROM GREENWOOD COUNTY
Court of Common Pleas

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

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 RESPONDENT'S INITIAL
BRIEF OF APPELLANTS/RESPONDENTS**

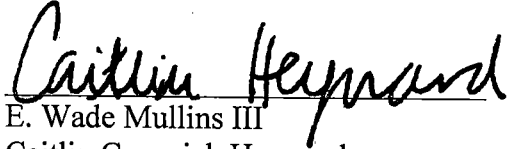
Pursuant to Rule 240(a) SCACR, Appellants/Respondents PC Construction of Greenwood, Inc. and Safeco Insurance Company of America (hereinafter referred to collectively as "PC"), respectfully requests an extension of thirty (30) days to file its Initial Brief of Appellants/Respondents. The current due date is July 6, 2015. The Appellants/Respondents PC respectfully requests the Court to grant an extension of thirty (30) additional days or until August 5, 2015 to serve and file its Initial Brief of Appellants/Respondents.

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 August 5, 2015.

July 6, 2015



E. Wade Mullins III
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*Attorneys for
Appellants/Respondents PC
Construction of Greenwood, Inc. and
Safeco Insurance Company of
America*

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PROOF OF SERVICE

I, Annie Rich, of Bruner, Powell, Wall & Mullins, LLC, attorneys for the Appellants/Respondents, do hereby certify that on this 6th day of July 2015, I served the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF OF APPELLANTS/RESPONDENTS** 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

Annie Rich
Annie Rich

BRUNER, POWELL, WALL & MULLINS, LLC

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CAITLIN C. HEYWARD

* 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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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 Wednesday, August 5, 2015 to file the Respondent's Initial Brief of Appellants/Respondents.

I have enclosed the original and six (6) copies of the **MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF OF APPELLANTS/RESPONDENTS**, a check in the amount of \$25.00 and a proof of service of this request on counsel for the Respondents/Appellants.

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,

Annie Rich

Annie Rich

Legal Assistant for Caitlin C. Heyward

/ar

Enclosures

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

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VIA HAND-DELIVERY

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

1015 Sumter Street

Columbia, SC 29201