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**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

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DEC 21 2015
SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY
COURT OF COMMON PLEAS

THE HONORABLE DIANE S. GOODSTEIN
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2015-002198
CIVIL ACTION NO. 2012-CP-18-2001

R. H. Moore Company, Inc.,

RESPONDENT,

versus

Knight's Precast, Inc.; Tobias & West, LLC;
Eric W. Tobias, P.E.; Dorchester County Water
and Sewer Department; Underground Solutions, Inc.;
B.P. Barber and Associates, Inc. n/k/a URS Corporation;
and Utility Services Authority, LLC;

DEFENDANTS,

Of which Underground Solutions, Inc. is the

APPELLANT.

MOTION FOR EXTENSION OF TIME

The Initial Brief of Appellant, Underground Solutions, Inc., and Designation of Matter to be Included in the Record on Appeal were originally due on November 19, 2015. At the Appellant's request, the Court granted a 30-day extension of time, until December 21, 2015, to serve and file the Appellant's Initial Brief and Designation of

Matter. The Appellant, Underground Solutions, Inc., respectfully requests the Court to grant a second extension of 30 days, or until Wednesday, January 20, 2016, to serve and file its Initial Brief of Appellant and Designation of Matter.

Counsel for the Appellant requests a second extension due to having taken leave during the month of December for a child's illness. Counsel has also prepared and filed several motions with the state trial courts and federal district court this month.

Accordingly, the Appellant, Underground Solutions, Inc., respectfully requests an additional 30-day extension of time in which to serve and file its Initial Brief of Appellant and Designation of Matter to be Included in the Record on Appeal.



Franklin J. Smith, Jr.
Carmen V. Ganjehsani
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
**ATTORNEYS FOR APPELLANT
UNDERGROUND SOLUTIONS, INC.**

December 17, 2015.

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Appellant, Underground Solutions, Inc., do hereby certify that I have this date served the foregoing Motion for an Extension of Time, dated December 17, 2015, by personally depositing a copy of the same in a United States Postal Service mailbox, postage prepaid, addressed to the parties indicated below:

W.H. Bundy, Jr., Esquire
M. Brent McDonald, Esquire
1037 Chuck Dawley Blvd, #F100,
Mt Pleasant, SC 29464
Attorneys for Respondent
R.H. Moore Company, Inc.



Carmen V. Ganjehsani
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Columbia, South Carolina 29202
ATTORNEYS FOR APPELLANT
UNDERGROUND SOLUTIONS, INC.

Date: December 17, 2015.

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Reply to: **Carmen V. Ganjehsani**
Direct Dial: 803-253-8692
cganjehsani@richardsonplowden.com

December 17, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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Re: *R.H. Moore Company, Inc. v. Underground Solutions, Inc. et al.*
Appellate Case No. 2015-002198
Case No.: 2012-CP-18-2001
RPR File No.: 121-665

Dear Ms. Kitchings:

I am enclosing for filing the original and six copies of the Appellant Underground Solutions, Inc.'s Motion for Extension of Time to file the Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm's check in the amount of \$25.00 to cover the filing fee for this Motion.

By copy of this letter, we are serving a copy of this Motion on counsel for the Respondent.

If you should have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG

Enclosures

cc: W.H. Bundy, Jr., Esquire
M. Brent McDonald, Esquire
Franklin J. Smith, Jr.

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RICHARDSON
RICHARDSON PLOWDEN ROBINSON, P.A.
PLOWDEN
ATTORNEYS AT LAW

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