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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

JAN 12 2016

SC Court of Appeals

Tanya A. Gee, Circuit Court Judge

Appellate Case No. 2015-002566  
Case No. 2015-CP-40-01082

Karl T. Harbath, .....Respondent,

v.

Stephen Sanders, Bennett-Hall Co., Inc., Sunbelt Rentals, Inc.,

Of whom Bennett-Hall Co., Inc. is the .....Appellant.

**MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER**

Pursuant to Rules 240 and 263(b), of the South Carolina Appellate Court Rules, Appellant Bennett-Hall Co., Inc. respectfully requests a thirty-day extension of the deadline for filing and serving their initial brief and designation of matter in this case. Other deadlines and obligations prohibit counsel from filing the initial brief and designation by the original deadline.

The current deadline is January 14, 2016. By our calculations, the new deadline for filing and serving Appellant's initial brief and designation of matter will be February 13, 2016. This is Appellant's first extension request.

Respectfully submitted,  
COLLINS & LACY, P.C.

By:   
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ATTORNEYS FOR APPELLANT  
BENNETT-HALL CO., INC.

January 12, 2016  
Columbia, South Carolina

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Appellate Case No. 2015-002566  
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Karl T. Harbath, .....Respondent,

v.

Stephen Sanders, Bennett-Hall Co., Inc., Sunbelt Rentals, Inc., Defendants,

Of whom Bennett-Hall Co., Inc. is the .....Appellant.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I hereby certify that I served a copy of the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on January 12, 2016, addressed to the following:

**COUNSEL SERVED:**

Melissa G. Mosier, Esq.  
McWhirter Bellinger & Associates, PA  
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(803) 252-5523  
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T. Harbath***

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Sanders***

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(803) 799-9091  
***Counsel for Third-Party Defendant,  
Black Box Network Services, Inc.***

Respectfully submitted,  
COLLINS & LACY, P.C.

By:   
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ATTORNEYS FOR APPELLANTS  
BENNETT-HALL CO., INC.

January 12, 2016  
Columbia, South Carolina



Kerri A. Rupert | D: 803.255.0421 | E: krupert@collinsandlacy.com

January 12, 2016

**VIA HAND DELIVERY**

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

JAN 12 2016

**SC Court of Appeals**

**Re: *Karl T. Harbath v. Stephen Sanders, Bennett-Hall Co., Inc., and Sunbelt Rentals, Inc.***  
***Civil Action No. 2015-CP-40-01082***  
***Claim No. 550-081747-001***  
***C&L File No. 000001-02261***

Please find enclosed for filing the original and seven (7) copies of the Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter in the above-referenced matter. I am also enclosing herewith a check in the amount of \$25.00 for the required filing fee. Please return a clocked copy with our courier.

By copy of this letter, I am serving a copy of same upon all counsel of record.

Thank you for your time and attention. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Kerri Rupert'.

Kerri A. Rupert

KAR:srm  
Enclosures

cc: Melissa G. Mosier, Esquire  
Thomas McRoy Shelley, Esquire  
Catherine Wrenn, Esquire  
Catherine Garbee Griffin, Esquire