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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Tanya A. Gee, Circuit Court Judge

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

RECEIVED
AUG 15 2016
SC Court of Appeals

Karl T. Harbath,Respondent,

v.

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

Of whom Bennett-Hall Co., Inc. is theAppellant.

**FIRST MOTION FOR EXTENSION OF TIME
TO FILE APPELLANT'S INITIAL REPLY BRIEF**

Pursuant to Rules 240 and 263(b), of the South Carolina Appellate Court Rules, Appellant Bennett-Hall Co., Inc. respectfully requests a ten-day extension of the deadline for filing and serving their initial reply brief in this case. This extension is necessary to adequately brief the issues in the appeal, given the fact that several are novel issues. In addition, counsel respectfully requests this extension due to counsel's current schedule and other filing deadlines. Counsel does not intend to file for any further extensions.

The current deadline is August 15, 2016. By our calculations, the new deadline for filing and serving Appellant's initial reply brief will be August 25, 2016.

Respectfully submitted,
COLLINS & LACY, PC

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ATTORNEYS FOR APPELLANT
BENNETT-HALL CO., INC.

August 15, 2016
Columbia, South Carolina

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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 theAppellant.

PROOF OF SERVICE

I hereby certify that I served a copy of the Appellant Bennett-Hall Co., Inc.'s Motion for Extension of Time to Serve Initial Reply Brief upon all parties, by placing a copy in the United States mail, postage prepaid, to all counsel of record on August 15, 2016, addressed to the following:

COUNSEL SERVED:

Melissa G. Mosier, Esq.
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Respectfully submitted,
COLLINS & LACY, PC

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August 15, 2016
Columbia, South Carolina



Brian A. Comer | D: 803.255.0446 | E: bcomer@collinsandlacy.com

August 15, 2016

VIA HAND DELIVERY

The Honorable Jenny A. Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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AUG 15 2016

SC Court of Appeals

Re: Karl T. Harbath v. Stephen Sanders, et al.
Appellate Case No. 2015-002566
Case No. 2015-CP-40-01082
Claim No. 550-081747-001
C&L File No. 000001-02261

Dear Ms. Kitchings:

Enclosed for filing are an original and seven (7) copies of Appellant Bennett-Hall Company, Inc.'s First Motion for Extension of Time to File Appellant's Initial Reply Brief in connection with the above matter. Please return a file-stamped copy to us via the awaiting courier.

By copy of this correspondence, we are hereby serving a copy of the same to opposing counsel. If you have any questions, please do not hesitate to contact our office.

Respectfully,

A handwritten signature in cursive script that reads "Brian A. Comer".

Brian A. Comer

BAC/kyn
Enclosures

cc: Melissa G. Mosier, Esq.
T. McRoy Shelley, III, Esq.
Catherine F. Wrenn, Esq.
Catherine Garbee Griffin, Esq.
Kerri A. Rupert, Esquire