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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III  
Circuit Court Judge, Second Judicial District

**RECEIVED**  
DEC 15 2017  
SC Court of Appeals

Civil Case No. 2015-CP-02-02389

Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

MOTION FOR LEAVE TO FILE INITIAL BRIEF AND DESIGNATION OF  
MATTER OUT-OF-TIME and FOR EXTENSION OF TIME TO FILE INITIAL  
BRIEF AND DESIGNATION OF MATTER

Appellant Pro Se Edward Pugh, responding to the Court of Appeals letter of December 12, 2017, respectfully requests this Court of Appeals to (a) grant him leave to file the *Initial Brief of Appellants* and the *Designation of Matter to be Included in the Record on Appeal* out-of-time, as well as (b) a thirty-day (30) extension in which to file the *Initial Brief of Appellant* and the *Designation of Matter to be Included in the Record on Appeal*.

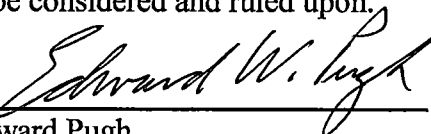
As to the first motion request, the Appellant requested the entire 21-page transcript from the court reporter "with your signed signature" on November 25, 2017. Said letter of request is similar to, but not the same as, the other two letters of request for transcript on file with this Court of Appeals. This letter of request for the 21-page transcript specifically requested the transcript with the court reporter's signature to make said transcript complete. The Appellant thought that a



transcript was not considered delivered per Rule 207 (2) until it was “complete” with the court reporter’s signature. Therefore, responding to the Clerk of Court’s December 12, 2017 letter, the Appellant respectfully requests leave to file the *Initial Brief of Appellant* and the *Designation of Matter to be Included in the Record on Appeal* out-of-time.

As to the second motion request, the Appellant respectfully requests a thirty-day (30) extension beyond the ten-day (10) currently allowed by the Clerk of Court’s letter of December 12, 2017. The basis for this motion is that the Appellant will not have sufficient time to adequately prepare the *Initial Brief of Appellant* and the *Designation of Matter to be Included in the Record on Appeal* while working not on his “case load” like other attorneys, but rather at his regular 40 hours per week job. Per the Clerk of Court’s letter of December 12, 2017, the filing would be due 10 days from the date of the letter or would be up on Friday, December 22, 2017. Anticipating a favorable reception and grant of this extension motion, the *Initial Brief of Appellant* and the *Designation of Matter to be Included in the Record on Appeal* would be due on or before Monday, January 22, 2018.

Finally, the Appellant respectfully requests this Court of Appeals to hold the briefing time in abeyance until such time as these motions may be considered and ruled upon.

  
s/ Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

Friday, December 15, 2017

Other Counsel of Record:

Michael D. Carrouth and  
Christina Landsdowne Rogers,  
Fisher & Phillips LLP,  
1320 Main St., Suite 750,  
Columbia, South Carolina 29201  
Attorneys for Respondent  
(803) 255-0000

**PROOF OF SERVICE OF A MOTION FOR LEAVE AND EXTENSION  
OF TIME OF INITIAL BRIEF AND DOM**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM AIKEN COUNTY  
Court of Common Pleas

Doyet A. Early, III  
Circuit Court Judge, Second Judicial District

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Case No. 2015-CP-02-02389

SC Court of Appeals

Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

**PROOF OF SERVICE**

I certify that I have served the **Motion for Leave to File Initial Brief and Designation of Matter Out-of-Time and For Extension of Time to File Initial Brief and Designation of Matter (DOM)** on CB&I AREVA MOX SERVICES, LLC and Globalpundits Technology Consultancy, LLC by depositing a copy of it in the United States Mail, postage prepaid, on December 15, 2017, addressed to their attorneys of record, Michael D. Carrouth and Christina Landsdowne Rogers, Fisher & Phillips, LLP, 1320 Main St., Suite 750, Columbia, South Carolina 29201.

Friday, December 15, 2017

*Edward W. Pugh*  
s/ \_\_\_\_\_  
Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

**LETTER TO THE APPELLATE COURT CLERK  
FILING THE MOTION FOR LEAVE AND EXTENSION OF TIME  
FOR INITIAL BRIEF AND DOM**

Friday December 15, 2017

**VIA HAND-DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
DEC 15 2017  
SC Court of Appeals

RE: Filing - Motion for Leave and Extension of Time – Initial Brief and DOM

Edward Pugh, Appellant vs CB&I AREVA MOX Services LLC, and  
Globalpundits Technology Consultancy, LLC Respondents.

Civil Case No.: 2015-CP-02-02389, Appellate Case No. 2017-002321

Dear Ms. Kitchings:

Hand carried to the Court for filing is a **Motion for Leave to File Initial Brief and Designation of Matter Out-of-Time and For Extension of Time to File Initial Brief and Designation of Matter (DOM)** in the above case. I am responding to the Court of Appeals letter of December 12, 2017. Also carried are the following:

- (1) Proof of Service of the above motion on the respondents.
- (2) A filing fee of \$25.

If you need anything else or I can otherwise be of any assistance, please feel free to contact me.

Sincerely,

*Edward W. Pugh*  
s/ \_\_\_\_\_

Edward Pugh  
1085 Old Clemson Hwy., Ste. E  
Seneca, South Carolina 29672  
(864) 723-7251  
Appellant, Pro Se

cc: Michael D. Carrouth and  
Christina Landsdowne Rogers  
c/o Fisher & Phillips, LLP  
1320 Main St., Suite 750,  
Columbia, South Carolina 29201  
Attorneys for Respondent  
(803) 255-0000

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