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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

Civil Case No. 2015-CP-02-02389

Appellate Case No. 2017-002321

RECEIVED
APR 16 2018
SC Court of Appeals

Edward Pugh

Appellant

v.

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

Respondents

CONSENT MOTION FOR EXTENSION OF TIME TO FILE
REPLY AND FINAL BRIEFS, RECORD ON APPEAL,
AND ANY ACTS

Appellant Pro Se Edward Pugh, respectfully requests this Court of Appeals to (a) grant him a twenty-day (20) day extension of time to file the *Reply and Final Briefs of Appellant, the Record on Appeal*, and the *15 Copies of each to the Court*, as well as (b) a twenty-day (20) day extension to file or comply with *any acts* of Rules 210, 211 per Rule 263, SCACR.

The Appellant respectfully requests a twenty-day (20) extension beyond the twenty-day (20) currently allowed per Rules 210 and 211, SCACR.. The basis for this motion is that the Appellant will not have sufficient time to adequately prepare the above while working, not on his own "case load" like other attorneys, but rather at his regular 40 hours per week job.

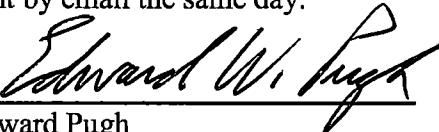


Rule 263, SCACR states that the time prescribed by these Rules for performing any act except the time for serving the notice of appeal under Rules 203 and 243 may be extended or shortened by the appellate court, or by any judge or justice thereof. The time prescribed by these Rules for performing any act or taking any action may not be extended by agreement of the parties.

Per Rules 210 and 211 SCACR, the filing would be due 20 days after the April 4, 2018 filing of the Proof of Service of the Record on Appeal. That would be Tuesday April 24, 2018. Anticipating a favorable reception and grant of this extension motion, the above would be due on or before Monday, May 14, 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.

Respondents were contacted by email with a draft copy of this motion on Wednesday April 11, 2018 and Mr. Dudek gave their consent by email the same day.

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

Thursday, April 12, 2017

Other Counsel of Record:

Michael D. Carrouth and
Benjamin Dudek,
Fisher & Phillips LLP,
PO Box 11612,
Columbia, South Carolina 29211
Attorneys for Respondent
(803) 255-0000

**PROOF OF SERVICE OF FILING
THE CONSENT MOTION FOR EXTENSION OF TIME
TO FILE REPLY AND FINAL BRIEFS, RECORD ON APPEAL,
AND ANY ACTS**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Case No. 2015-CP-02-02389

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Appellant

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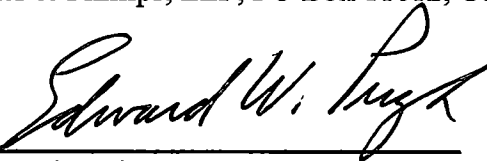
Respondents

PROOF OF SERVICE

I certify that I have served the **Consent Motion for Extension of Time to File Reply and Final Briefs, the Record on Appeal, and any Acts** 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 Thursday April 12, 2018, addressed to their attorneys of record, Michael D. Carrouth and Benjamin Dudek, Fisher & Phillips, LLP, PO Box 11612, Columbia, South Carolina 29211.

Thursday, April 12, 2018

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 CONSENT MOTION FOR EXTENSION OF TIME
TO FILE REPLY AND FINAL BRIEFS, RECORD ON APPEAL,
AND ANY ACTS**

Thursday April 12, 2018

VIA CERTIFIED US MAIL

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

RECEIVED
APR 16 2018
SC Court of Appeals

RE: Filing – Consent Motion for Extension of Time – Briefs, Record, etc.

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

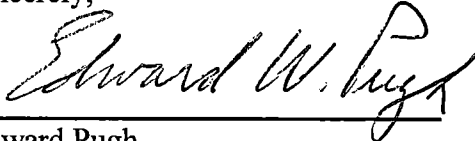
Dear Ms. Kitchings:

Sent by US certified mail to the Court for filing is a Consent Motion for Extension of Time to File Reply and Final Briefs, the Record on Appeal, and any Acts in the above case. Also included are the following:

- (1) Proof of Service of the above motion on the Respondents.
- (2) A money order for the filing fee of \$25.

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

Sincerely,


s/

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

cc: Michael D. Carrouth and
Benjamin Dudek,
c/o Fisher & Phillips, LLP
PO Box 11612,
Columbia, South Carolina 29211
Attorneys for Respondent
(803) 255-0000

Edward W. Pugh
1085 Old Clemson Hwy, Ste. E
Seneca, SC,
29672



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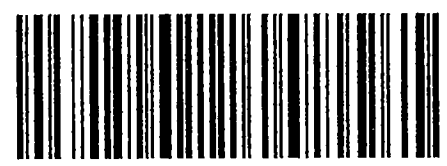


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APR 16 2018
COURT OF APPEALS

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