

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Honorable Robin B. Stilwell, Circuit Court Judge

Case No.: 2014-CP-23-05031

RECEIVED
JUN 25 2018
SC Court of Appeals

Oldcastle APG South, Inc.,
d/b/a/ Adams Products Company,
and Oldcastle APG Northeast, Inc.,
d/b/a Foster-Southeastern, Respondents,

v.

Daniel B. Albert, Appellant.

**RESPONDENTS' RETURN IN OPPOSITION TO
REQUEST FOR EXTENSION OF TIME**

Respondents Oldcastle APG South, Inc., d/b/a/ Adams Products Company, and Oldcastle APG Northeast, Inc., d/b/a Foster-Southeastern hereby oppose Appellant Daniel B. Albert's request for a 30-day extension in which to file his initial reply brief. Under this Court's rules, an initial reply brief is due 10 days after receipt of the respondent's initial brief. While Respondents do not oppose some extension of time, any extension granted to Appellant should be significantly less than thirty days. He has provided no explanation of why he needs more than 10 days to prepare and file his initial reply brief.


For the reasons set forth herein, Respondents respectfully request that this Court deny Appellant's request for a 30-day extension in which to file his initial reply brief and

that, if an extension is granted, that it be less than thirty days.

Respectfully submitted,

McANGUS GOUDELOCK & COURIE, LLC

June 21, 2018

A handwritten signature in black ink, appearing to read "H. F. Hiser", is written over a horizontal line.

Helen F. Hiser

S.C. Bar No.: 76124

735 Johnnie Dodds Blvd., Suite 200 (29464)

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

Attorneys for Respondents

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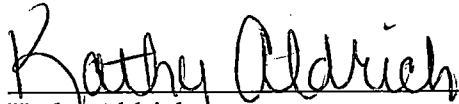
v.

Daniel B. Albert, Appellant.

PROOF OF SERVICE

I certify that on the 21st day of June 2018, I served the **Respondents' Return in Opposition to Request for Extension of Time** on *pro se* Appellant Daniel B. Albert by depositing a copy of it in the United States Mail, postage prepaid, addressed as follows:

Daniel B. Albert
2 Tennwood Dr.
Greenville, SC 29609


Kathy Aldrich
Legal Assistant to Helen F. Hiser
McAngus, Goudelock & Courie LLC
735 Johnnie Dodds Blvd., Suite 200
P.O. Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

*Attorneys for Respondents Oldcastle APG
South, Inc., d/b/a Adams Products
Company, and Oldcastle APG Northeast,
Inc., d/b/a Foster-Southeastern*



Reply To
HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

June 21, 2018

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JUN 25 2018
SC Court of Appeals

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Oldcastle APG South, Inc. d/b/a Adams Products Company and
Oldcastle APG Northeast, Inc. d/b/a Foster-Southeastern v. Madawaska
Hardscape Products, Inc. and Daniel B. Albert
Civil Action No.: 2014-CP-23-05031 (Greenville)
MGC File No.: 20799.14001
Appeal No.: 2017-002183

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Return in Opposition to Request for Extension of Time, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the enclosed self-addressed, stamped envelope.

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

Yours truly,
McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Daniel B. Albert, *pro se* (via U.S. Mail & Certified Mail)
Sarah T. Brooks, Oldcastle, Inc.

mgc

POST OFFICE BOX 650007
MOUNT PLEASANT, SC 29465

20799.14001 HFH/kea
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

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