

90430

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

RECEIVED  
JUL 30 2019  
SC Court of Appeals

Court of Appeals Unpublished Opinion No. 2019-UP-260  
Appellate Case No. 2017-002321

Edward Pugh

Appellant

v.

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

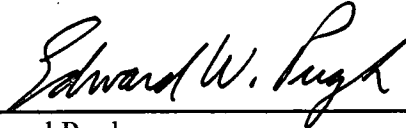
Respondents

**MOTION FOR FILING EXTENSION OF TIME  
REGARDING A PETITION FOR REHEARING**

Appellant Pro Se Edward Pugh, responding to the Court of Appeals letter of July 17, 2019, respectfully requests this Court of Appeals to grant him a thirty-day (30) extension in which to file a *Petition for Rehearing*.

The Appellant respectfully requests a thirty-day (30) extension beyond the fifteen (15) day currently allowed by Rule 221(a). The basis for this motion is that the Pro Se Appellant will not have sufficient time to adequately prepare the *Petition for Rehearing*, especially with the extent of the cited cases. Counting days from the Clerk of Court's letter of July 17, 2019, the filing would be due by the end of the 15<sup>th</sup> day from the date of the letter, i.e., the close of business on Thursday, August 1, 2019. Anticipating a favorable reception and grant of this motion, the *Petition for Rehearing* would be due thirty (30) days from August 1, 2019, or on or before Saturday, August 31, 2019.

Finally, the Appellant respectfully requests this Court of Appeals to hold the petition time in abeyance until such time as this motion 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

Tuesday, July 30, 2019

Other Counsel of Record:

Michael D. Carrouth and  
Benjamin Patrick James Dudek,  
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 EXTENSION OF TIME  
REGARDING A PETITION FOR REHEARING**

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**

JUL 30 2019

SC Court of Appeals

Case No. 2015-CP-02-02389

Court of Appeals Unpublished Opinion No. 2019-UP-260  
Appellate Case No. 2017-002321,

Edward Pugh

Appellant

v.

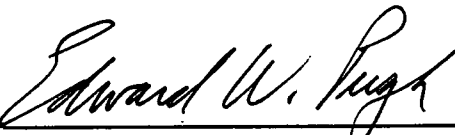
CB&I AREVA MOX SERVICES, LLC  
and Globalpundits Technology  
Consultancy, LLC

Respondents

**PROOF OF SERVICE**

I certify that I have served the **Motion for Extension of Time to File a Petition for Rehearing** 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 July 30, 2019, addressed to their attorneys of record, Michael D. Carrouth and Benjamin Patrick James Dudek, Fisher & Phillips, LLP, 1320 Main St., Suite 750, Columbia, South Carolina 29201.

Tuesday, July 30, 2019

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 EXTENSION OF TIME  
REGARDING A PETITION FOR REHEARING**

Tuesday July 30, 2019

**HAND CARRIED TO COURT OF APPEALS**

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

**RECEIVED**  
JUL 30 2019  
SC Court of Appeals

RE: Filing - Motion for Extension of Time – Petition for Rehearing

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  
Court of Appeals Unpublished Opinion No. 2019-UP-260

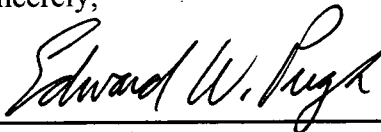
Dear Ms. Kitchings:

Hand carried to the Court for filing is a **Motion for Extension of Time to File a Petition for Rehearing** in the above case. I am responding to the Court of Appeals letter of Wednesday, July 17, 2019 regarding its recent Opinion 2019-UP-260. Also carried are the following:

- (1) Proof of Service of the above motion on the respondents.
- (2) A filing fee of \$50.
- (3) Six Copies of this Motion for Extension of Time, and Proof of Service

If you need anything else, 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 Patrick James Dudek  
c/o Fisher & Phillips, LLP  
1320 Main St., Suite 750,  
Columbia, South Carolina 29201  
Attorneys for Respondent  
(803) 255-0000