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IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Civil Action No. 2015-CP-23-00973

Appellate Case No. 2019-000701

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OCT 31 2019

SC Court of Appeals

O'Neal Constructors, LLC.....Respondent,

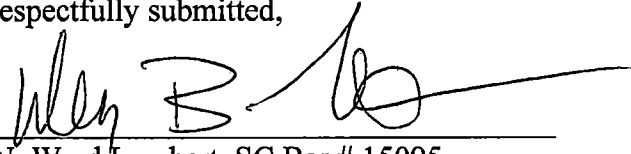
v.

GE Betz, Inc. d/b/a GE Water & Process Technologies Appellant.

**CONSENT MOTION FOR EXTENSION OF TIME IN WHICH TO FILE AND SERVE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 240, SCACR, Respondent, O'Neal Constructors, LLC hereby moves this Court for an extension of time to file and serve Respondent's Initial Brief and Designation of Matter to be included in the Record on Appeal in the above-referenced matter, which is currently due on November 7, 2019. Respondent respectfully request that the Court extend the date an additional thirty (30) days due to out-of-town commitments of Respondent's counsel in other matters. With the requested extension, Respondent's new due date would be December 7, 2019. Counsel for Appellant, GE Betz, Inc. d/b/a GE Water & Process Technologies consents to this extension of time.

Respectfully submitted,



N. Ward Lambert, SC Bar # 15095
Wesley B. Lambert, SC Bar # 101785
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*Attorneys for Respondent, O'Neal Constructors,
LLC*

We consent:

Gray T. Culbreath by Wesley B. Lambert
Gray T. Culbreath, SC Bar # 11907 *with express permission*
Ashley B. Stratton, SC Bar # 74840
GALLIVAN, WHITE & BOYD, P.A.
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*Attorneys for Appellant, GE Betz, Inc. d/b/a GE
Water & Process Technologies*

October 29, 2019

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Civil Action No. 2015-CP-23-00973

Appellate Case No. 2019-000701

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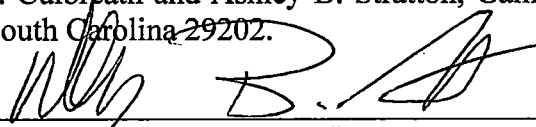
O'Neal Constructors, LLC.....Respondent,

v.

GE Betz, Inc. d/b/a GE Water & Process Technologies Appellant.

PROOF OF SERVICE

I certify that I have served the Consent Motion for Extension of Time in Which to File and Serve Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal by emailing and depositing a copy of it in the United States Mail, postage prepaid, on October 30, 2019, addressed to its attorneys of record, Gray T. Culbreath and Ashley B. Stratton, Gallivan, White & Boyd, Post Office Box 7368, Columbia, South Carolina 29202.


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*Attorneys for Respondent, O'Neal
Constructors, LLC*

October 30, 2019



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Greenville, SC 29601

P.O. Box 908
Greenville, SC 29602

October 30, 2019

VIA FEDEX

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29211

RE: *O'Neal Constructors, LLC, Respondent v. GE Betz, Inc. d/b/a GE Water & Process Technologies, Appellant*
Greenville County Case No. 2015-CP-23-00973
Appellate Case No. 2019-00701

Dear Ms. Kitchings:

Enclosed please find the original and one copy of Respondent, O'Neal Constructors, LLC's *Consent Motion for Extension of Time in Which to File and Serve Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal* in the above-referenced matter. We appreciate you filing the original and returning the filed-stamped copy to our office via the enclosed return envelope. Also enclosed please find our firm's \$50 filing fee. If you have any questions regarding the enclosed filing, please do not hesitate to contact me.

Thank you for your consideration in this matter.

Sincerely,

HARPER LAMBERT, P.A.

Wesley B. Lambert, Esq.

weslambert@harperlambert.com

WBL/ljh

Enclosures

cc: Gray T. Culbreath, Esq.
Ashley B. Stratton, Esq.

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OCT 31 2019

SC Court of Appeals

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UNITED STATES US

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TO THE HON. JENNY ABBOTT KITCHINGS
SC COURT OF APPEALS
1015 SUMTER STREET

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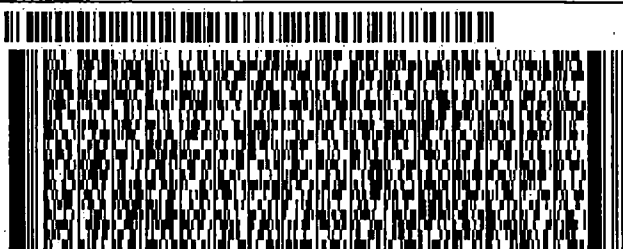
COLUMBIA SC 29211

(803) 734-1890

REF: O'NEAL/GE/APPEAL

INV:
PO:

DEPT:

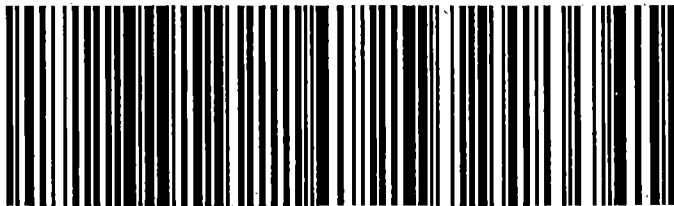


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SC Court of Appeals

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