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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,

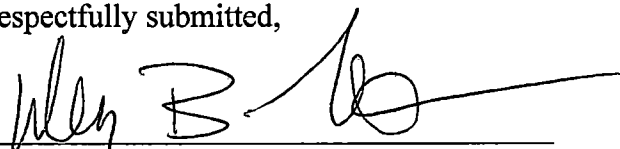
v.

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.

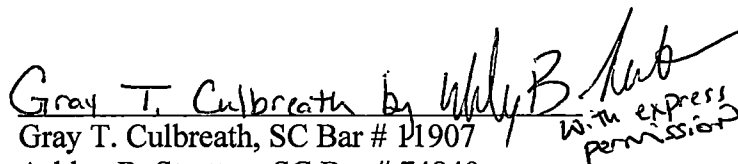
Respectfully submitted,



N. Ward Lambert, SC Bar # 15095  
Wesley B. Lambert, SC Bar # 101785  
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201 W. McBee Ave., Suite 450 (29601)  
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*Attorneys for Respondent, O'Neal Constructors,  
LLC*

We consent:



Gray T. Culbreath, SC Bar # 11907  
Ashley B. Stratton, SC Bar # 74840  
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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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SC Court of Appeals

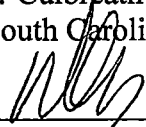
O'Neal Constructors, LLC.....Respondent,

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



HARPER LAMBERT, P.A.

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201 W. McBee Avenue, Suite 450  
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](mailto:weslambert@harperlambert.com)

WBL/ljh

Enclosures

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

**RECEIVED**

OCT 31 2019

SC Court of Appeals

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 UNITED STATES US

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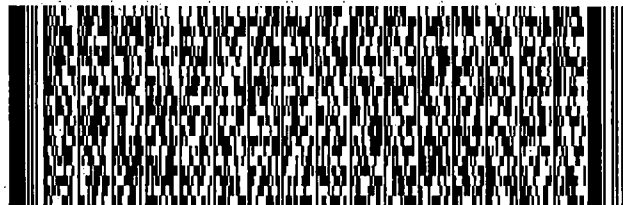
TO THE HON. JENNY ABBOTT KITCHINGS  
 SC COURT OF APPEALS  
 1015 SUMTER STREET

COLUMBIA SC 29211

(803) 734-1890  
 INV:  
 PO:

REF: O'NEAL/GE/APPEAL

DEPT:



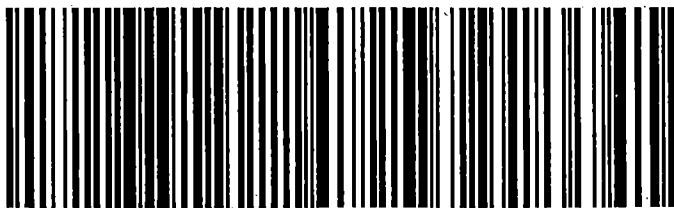
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OCT 31 2019

SC Court of Appeals

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