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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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DEC 04 2019
SC Court of Appeals

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

v.

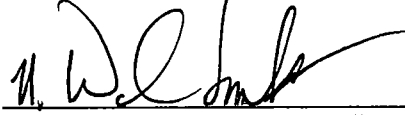
GE Betz, Inc. d/b/a GE Water & Process Technologies Appellant.

**SECOND 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, based upon the Court's prior order dated November 4, 2019 is currently due on December 9, 2019. Respondent respectfully requests that the Court extend the date an additional two weeks due to out-of-town commitments of Respondent's counsel in other matters and delays associated with the Thanksgiving Holiday. With the requested extension, Respondent's new due date would be December 23, 2019. Absent extraordinary circumstances, Respondent does not anticipate that any

further requests for extension of time will be necessary or requested. Counsel for Appellant, GE Betz, Inc. d/b/a GE Water & Process Technologies consents to this extension of time.

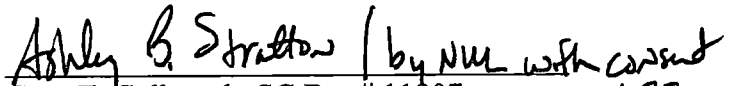
Respectfully submitted,



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:



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

December 3, 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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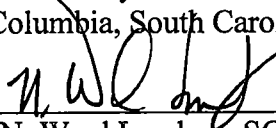
O'Neal Constructors, LLC.....Respondent,

v.

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

PROOF OF SERVICE

I certify that I have served the *Second 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 December 3, 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*

December 3, 2019



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Greenville, SC 29602

December 3, 2019

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SC Court of Appeals

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 *Second 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.

N. Ward Lambert, Esq.

wlambert@harperlambert.com

NWL/ljh

Enclosures

cc: Gray T. Culbreath, Esq. (via e-mail, w/enc.)
Ashley B. Stratton, Esq. (via e-mail, w/enc.)
Wesley B. Lambert, Esq. (via e-mail, w/enc.)

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UNITED STATES US

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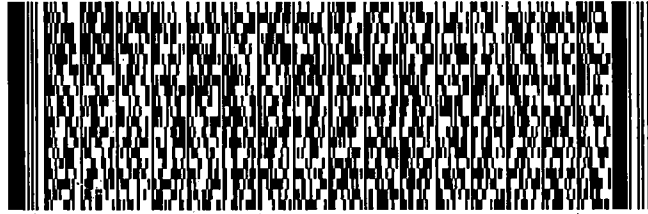
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COLUMBIA SC 29211

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SC Court of Appeals



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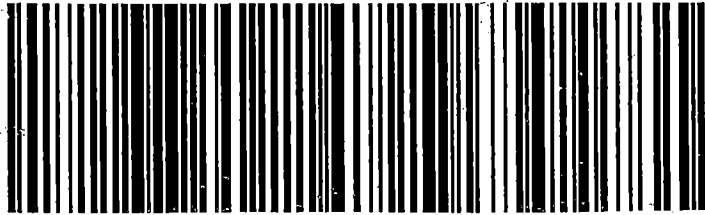
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