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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

Case No. 2019-002126

Jerry Howard Crawford, individually,
And as Personal Representative of the
Estate of Evelyn Kay Crawford, Respondent

v.

Celanese Corporation, Aurora Pump Company,
Carrier Corporation, CNA Holdings, LLC, f/k/a
Hoechst Celanese Corporation, Covil Corporation,
Crane Co., Daniel International Corporation f/k/a
Daniel Construction Company, Inc., Flowserve
Corporation, individually and as successor-in-interest
to Anchor/Darling Valve Company, and individually
as successor-in-interest to Durco Pumps, Flowserve,
US Inc., Fluor Constructors International, f/k/a Fluor
Corporation, Fluor Constructors, International, Inc.
Fluor Daniel Services Corporation, Fluor Enterprises,
Inc., Ford Motor Company, Genuine Parts Company,
d/b/a Rayloc (a/k/a NAPA), The Goodyear Tire &
Rubber Company, Goulds Pumps, Inc., Grinnell, LLC
f/k/a Grinnell Corp., f/k/a ITT Grinnell Corp.,
Honeywell International, Inc., f/k/a Allied-Products
Liability Signal, Inc., sued as successor-in-interest
to Bendix Corporation, Ingersoll-Rand Company,
John Crane, Inc., Metropolitan Life Insurance
Company, a wholly owned subsidiary of Metlife Inc.
National Automotive Parts Association, (NAPA),
Parker-Hannifin Corporation, Pneumo Abex, LLC
successor-in-interest to Abex Corporation, Spirax
Sarco, Inc., SPX Cooling Technologies, Inc.,
individually and as successor-in-interest to
Marley Cooling Towers, Co., Standard Motor
Products, Inc., sued as successor-in-interest to EIS
Automotive, United States Fidelity & Guaranty

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Company, and The William Powell Company, Defendants,
Of Which, Covil Corporation is the Appellant.

APPELLANT'S MOTION FOR EXTENSION OF TIME

NOW COMES Appellant, Covil Corporation ("Appellant") by and through its undersigned counsel, and respectfully moves the Court pursuant to Rule 240, SCACR, for a forty one-day extension of time to and including March 2, 2020, to file and serve its Initial Brief and Designation of Matter to be Included in the Record on Appeal in this case. In support thereof, Appellant shows the Court the following:

1. Appellant's time for filing and serving its Initial Brief and Designation of Matter to be Included in the Record on Appeal has not expired.
2. Exhibit 1 reflects correspondence from Appellant to the court reporter to order the transcript of the November 11, 2019 hearing referenced in Appellant's Notice of Appeal.
3. Appellant needs additional time in order to prepare its Initial Brief and Designation of Matter to be included in the Record on Appeal.
4. A forty one-day extension of time for Appellant to file its Initial Brief and Designation of Matter to be included in the Record on Appeal will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed brief in this case.
5. Appellant does not request this extension for the impermissible purpose of delay.
6. Appellant attempted to confer with counsel for Appellee regarding this motion but was unsuccessful prior to the time of filing.

WHEREFORE, Appellant Covil Corporation respectfully moves the Court for a forty one-day extension of time to and including March 2, 2020, to file and serve Appellant's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

This the 17th day of January, 2020.



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S.C. Bar 76952
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Counsel for Covil Corporation

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Rubber Company, Goulds Pumps, Inc., Grinnell, LLC
f/k/a Grinnell Corp., f/k/a ITT Grinnell Corp.,
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Company, and The William Powell Company, Defendants

Of Which, Covil Corporation is the Appellant.

PROOF OF SERVICE

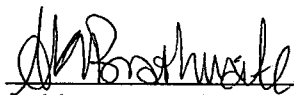
I, Ashley K. Brathwaite, of Ellis & Winters LLP, do hereby certify that I have served Appellant's Motion for Extension of Time, via electronic mail and by depositing the same in the United States Mail, properly posted on the 17th day of January 2020, addressed as follows to counsel of record:

Theile B. McVey
KASSEL McVEY ATTORNEYS AT
LAW
1330 Laurel Street
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**Attorney for Respondent Jerry Howard
Crawford, individually and as Personal
Representative of the Estate of Evelyn
Kay Crawford**

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**Attorney for Respondent Jerry
Howard Crawford, individually and as
Personal Representative of the Estate
of Evelyn Kay Crawford**



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Counsel for Covil Corporation



Writer's E-Mail Address:
ashley.brathwaite@elliswinters.com

Writer's Direct Dial Number:
(919) 573-1297

January 17, 2020

VIA FEDERAL EXPRESS

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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RE: Jerry Howard Crawford, Individually, and as Personal Representative of the Estate of Evelyn Kay Crawford, Respondent v. Covil Corporation, Appellant,
Case No. 2017-CP-42-04429

Dear Ms. Kitchings:

Enclosed for filing is the original and six copies of Covil Corporation's Motion for an Extension of Time along with the required filing fee of \$50.00.

If everything meets with your approval, please return a file-stamped copy of the motion in the enclosed self-addressed, stamped envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ashley K. Brathwaite".

Ashley K. Brathwaite

Enclosures

cc: all counsel of record

ORIGIN ID:RZZA (919) 865-7000
ASHLEY K. BRATHWAITE
ELLIS & WINTERS LLP
4131 PARKLAKE AVENUE
SUITE 400
RALEIGH, NC 27612
UNITED STATES US

SHIP DATE: 17JAN20
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CAD: 4782305/NET4160

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TO THE HONORABLE JENNY ABBOTT KITCHINGS
CLERK, S.C. COURT OF APPEALS
1220 SENATE STREET

COLUMBIA SC 29201

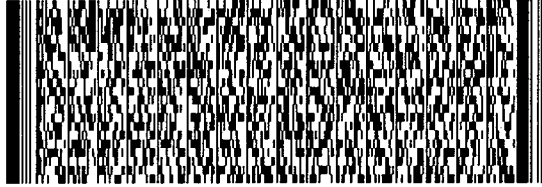
(919) 865-7000

REF: 13502-11

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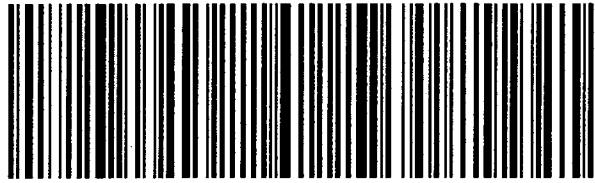
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