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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

RECEIVED
JAN 22 2020
SC Court of Appeals

Appellate Case No. 2018-001965

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 Company; and The William Powell Company, Defendants,

Of Which, Covil Corporation is the Appellant.


APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE RETURN TO MOTION TO DISMISS APPEAL

NOW COMES Appellant Covil Corporation, by and through its undersigned counsel, and respectfully moves the Court pursuant to Rule 240, SCACR, for a ten-day extension of time, to and including February 3, 2020, to file and serve its return to Respondent's Motion to Dismiss Appeal in this case. In support thereof, Appellant shows the Court the following:

1. Appellant received service of Respondent's Motion to Dismiss Appeal by U.S. Mail on January 21, 2020, over a week after the motion was filed.
2. Under SCACR 240(e), Appellant's time for filing and serving a return to the motion is January 23, 2020—two days after Appellant received Respondent's motion in the mail.
3. Appellant needs additional time to prepare its return to the motion.
4. A ten-day extension of time will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed return to the motion.
5. Appellant does not request this extension for the impermissible purpose of delay.
6. Appellant attempted to confer with counsel for Respondent regarding this extension request but was unsuccessful prior to the time of filing.

WHEREFORE, Appellant Covil Corporation respectfully moves the Court for a ten-day extension of time to and including February 3, 2020, to file and serve its return to Respondent's Motion to Dismiss Appeal.

This the 22nd day of January, 2020.

 *with permission for*
Ashley K. Brathwaite (S.C. Bar 76952)
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Counsel for Covil Corporation

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Of Which, Covil Corporation is the Appellant.

PROOF OF SERVICE

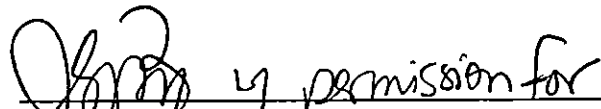
I, Ashley K. Brathwaite of Ellis & Winters LLP, do hereby certify that I have served Appellant's Motion for Extension of Time, via electronic mail and by depositing the same in the United States Mail, properly posted on the 22nd day of January 2020, addressed as follows to counsel of record:

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