

92208

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907  
Appellate Case No. 2019-001599

Karyn Cavanaugh ..... Appellant

v.

New Age Contractors, LLP ..... Respondent

**RECEIVED**  
FEB 20 2020  
SC Court of Appeals

**MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Pursuant to Rule 240, SCACR, the Respondent New Age Contractors, LLP hereby requests a thirty (30) day extension to serve and file its Initial Brief pursuant to Rule 208, SCACR. This request is the first one by New Age Contractors, LLP. New Age Contractors, LLP makes this request because the parties to the appeal are engaging in settlement efforts in an attempt to resolve the issues on appeal and settle this matter. Further, Ransome H. Helmly, counsel for Appellant, was consulted about this Motion and has no objection thereto.

SMITH | CLOSSER | WHEELER, PA



William K. Kalivas  
SC Bar No. 80201, wkalivas@scnlaw.com  
7455 Cross County Road, Ste 1 (29418)  
P.O. Box 40578, Charleston, SC 29423  
843-760-0220; 843-552-2678 (fax)  
Attorneys for New Age Contractors, LLP

February 18, 2020

18-163

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Deadra L. Jefferson, Circuit Court Judge

Case No. 2018-CP-10-4907  
Appellate Case No. 2019-001599

**RECEIVED**  
FEB 20 2020  
SC Court of Appeals

Karyn Cavanaugh ..... Appellant

v.

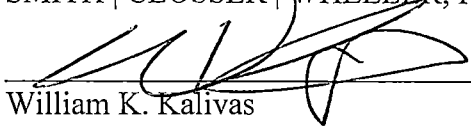
New Age Contractors, LLP ..... Respondent

**PROOF OF SERVICE**

I certify that I have served a copy of Respondent New Age Contractors, LLP's Motion for Extension of Time to File Initial Brief by depositing a copy of it in the United States Mail, post prepaid, on February 18, 2020 addressed to all attorneys of record, listed on the attached.

Respectfully Submitted,

SMITH | CLOSSER | WHEELER, PA

  
William K. Kalivas  
SC Bar No. 80201, wkalivas@scnlaw.com  
7455 Cross County Road, Ste 1 (29418)  
P.O. Box 40578, Charleston, SC 29423  
843-760-0220; 843-552-2678 (fax)  
Attorneys for New Age Contractors, LLP

February 18, 2020

18-163

Ransome H. Helmly, Esquire  
SC Bar No.: 78081  
Law Office of Ransome H. Helmly, LLC  
409 Coleman Blvd., Ste. 200  
Mt. Pleasant, SC 29464  
843-884-0184  
[rh@helmylaw.com](mailto:rh@helmylaw.com)  
Attorney for Appellant

# Smith | Closser | Wheeler, P.A.

Attorneys at Law  
7455 Cross County Road, Suite One  
Post Office Box 40578  
Charleston, South Carolina 29423-0578

William K. Kalivas  
wkalivas@scnlaw.com

Office – 843-760-0220  
Fax – 843-552-2678  
www.smithclosser.com

February 18, 2020

**RECEIVED**  
FEB 20 2020  
SC Court of Appeals

**VIA FIRST CLASS MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

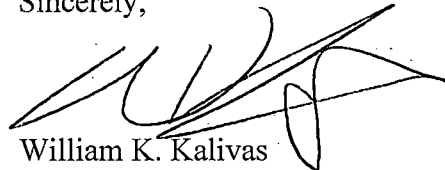
RE: Karyn Kavanaugh, Appellant v. New Age Contractors, LLP, Respondent  
Appellate Case No. 2019-001599  
SCW File No. 18-163

Dear Ms. Kitchings:

I represent New Age Contractors, LLP in the above referenced matter. I am enclosing an original and six (6) copies of a Motion for Extension of Time to File Initial Brief on behalf of New Age Contractors, LLP pursuant to Rule 208, SCACR. I am requesting a thirty (30) day extension. This request is the first one for an extension.

If you have any questions concerning this matter, please do not hesitate to contact me.

Sincerely,



William K. Kalivas

cc: Ransome H. Helmly, Esq.

# Smith | Closser | Wheeler, P.A.

Attorneys at Law

7455 Cross County Road, Suite One

Post Office Box 40578

Charleston, South Carolina 29423-0578

FIRST-CLASS



02 1P  
0001173148 FEB 18 2020  
MAILED FROM ZIP CODE 29418

\$ 000.65<sup>0</sup>

RECEIVED

FEB 20 2020

SC Court of Appeals

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

P.O. Box 11629

Columbia, SC 29211

2921181629 5012

