

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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Jun 11 2020

SC Court of Appeals

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 (Covil), by and through its undersigned counsel. Covil respectfully moves the Court pursuant to Rule 240, SCACR, for an extension of time, to and including July 17, 2020, to file and serve its Reply Brief in this case. In support thereof, Appellant shows the Court the following:

1. Covil’s time for filing and serving its Reply Brief has not expired.
2. The current deadline for Covil to serve its Reply Brief is June 19, 2020.
3. Covil needs additional time in order to prepare its Reply Brief.
4. A thirty-day extension of time for Covil to file its Reply Brief 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. Counsel for Appellant has conferred with counsel for Respondent and Respondent does not object to this extension.

WHEREFORE, Appellant Covil Corporation respectfully moves the Court for a thirty-day extension of time, to and including July 17, 2020, to file and serve its Reply Brief.

This the 11th day of June, 2020.

/s/ Ashley K. Brathwaite
Ashley K. Brathwaite
S.C. Bar 76952
ELLIS & WINTERS LLP
4131 Parklake Avenue, Suite 400
Raleigh, NC 27612
Telephone: (919) 573-1297
ashley.brathwaite@elliswinters.com

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 on the 11th day of June, 2020 addressed as follows to counsel of record:

Theile B. McVey
John D. Kassel
KASSEL McVEY ATTORNEYS AT
LAW
1330 Laurel Street
Columbia, South Carolina 29202
tmcvey@kassellaw.com
jkassel@kassellaw.com

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

Jonathan M. Holder
Ka'Leya Hardin
DEAN OMAR BRANHAM SHIRLEY,
LLP
302 N. Market Street, Ste. 300
Dallas, Texas 75202
jholder@dobslegal.com
khardin@dobslegal.com

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

/s/ Ashley K. Brathwaite
Ashley K. Brathwaite
S.C. Bar 76952
ELLIS & WINTERS LLP
4131 Parklake Avenue, Suite 400
Raleigh, NC 27612
Telephone: (919) 573-1297
ashley.brathwaite@elliswinters.com

Counsel for Covil Corporation