

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 19 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 to the Respondent’s Designation of Matter to Be Included in the Record on Appeal in this case. In support thereof, Appellant shows the Court the following:

1. Covil’s time for filing and serving its reply has not expired.
2. The current deadline for Covil to serve its reply is June 19, 2020.
3. Covil needs additional time in order to prepare its reply.
4. This extension of time for Covil to file its reply will serve the interests of justice by allowing counsel adequate time to prepare a thorough reply to Respondent’s Designation of Matter to Be Included in the Record on Appeal in this case.
5. Appellant does not request this extension for the impermissible purpose of delay.
6. Counsel for Appellant attempted to confer with counsel for Respondent and was not able to assess whether Respondent has an objection to this request prior to filing this motion.

WHEREFORE, Appellant Covil Corporation respectfully moves the Court for an extension of time, to and including July 17, 2020, to file and serve its reply to the Respondent's Designation of Matter to Be Included in the Record on Appeal.

This the 19th day of June, 2020.

/s/ Ashley K. Brathwaite
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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 19th day of June, 2020 addressed as follows to counsel of record:

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