

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson

Case No. 2017-CP-26-000273

**RECEIVED**

**Aug 03 2020**

**SC Court of Appeals**

Carolina Cool, Inc.,.....Plaintiff,

v.

Garrard Construction Group, Inc., Dave & Buster’s of South Carolina, Inc. and Broadway at the Beach, Inc., and Billys Plumbing Company LLC.....Defendants,

AND

Garrard Construction Group, Inc., .....Third-Party Plaintiff,

v.

RLI Insurance Company, .....Third-Party Defendant.

Of Which Carolina Cool, Inc. is the .....Respondent,

and

Garrard Construction Group, Inc. is the ..... Appellant.

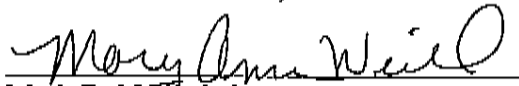
**Motion for Extension of Time to File Respondent’s Initial Brief**

Pursuant to Rule 263(b), SCACR, Respondent respectfully requests a thirty-day extension to file and serve its Initial Brief. The undersigned counsel will file the Respondent’s Initial Brief on or

before September 2, 2020. Counsel seeks this extension due to unexpected workload concerns resulting from the current COVID-19 emergency, unexpected personal matters of counsel, and the need to order a transcript of a motion hearing for possible inclusion in the record.

Respectfully submitted,

**NEILL LAW FIRM, PA**



Mark D. Neill, S.C. Bar No: 14273

Mary Anna Neill, S.C. Bar No. 15740

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Attorneys for Respondent Carolina Cool,  
Inc.

Dated: August 1, 2020  
Murrells Inlet, South Carolina.

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and

Garrard Construction Group, Inc. is the ..... Appellant.

**PROOF OF SERVICE**


I certify that I have served Respondent’s Motion for Extension of Time to File Respondent’s Initial Brief on all attorneys of record by depositing a copy of same in the United States Mail, First

Class postage prepaid, on August 1, 2020, addressed as follows:

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Sarah P. Spruill  
Haynsworth Sinkler Boyd, P.A.  
P.O. Box 2048  
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Attorneys for RLI Insurance Company

NEILL LAW FIRM, PA

  
Mary Anna Neill

Dated: August 1, 2020  
Murrells Inlet, South Carolina.

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MARY ANNA NEILL  
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August 1, 2020

VIA FACSIMILE (803) 734-1839  
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

**Aug 03 2020**

**SC Court of Appeals**

*Re: Carolina Cool, Inc. vs. Garrard Construction Group, Inc., et al.*  
*Case No: 2017-CP-26-3562*  
*Appellate Case No: 2020-000273*

Dear Ms. Kitchings:

The Neill Law Firm, PA represents Respondent Carolina Cool, Inc. Please find enclosed for filing, *Respondent's Motion for Extension of Time to file its Initial Brief*, together with a Proof of Service. In accordance with the Supreme Court's Amended Order dated May 29, 2020, initially filed March 20, 2020, a filing fee has not been included.

Thank you for your assistance in this matter. If any additional information is needed, please let me know.

With kindest regards, I am

Sincerely,



Mark D. Neill

cc: Counsel of Record