

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Case No. 2017-CP-26-03562

RECEIVED

Sep 15 2020

SC Court of Appeals

Carolina Cool, Inc. Plaintiff,

v.

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

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.

**CONSENT MOTION FOR SECOND EXTENSION OF TIME FOR APPELLANT
TO FILE INITIAL REPLY BRIEF AND DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

The initial appellant’s brief and designation of matter are currently due on September 21, 2020. Due to current workload obligations and scheduled vacation of counsel for the week of September 21, Appellant respectfully requests a second ten-day extension of time in which to file its initial reply brief and designation of matter to be included in the record on appeal, making them

due on October 1, 2020. Counsel for Respondent has graciously consented to this request. Appellant asks that current filing deadlines be stayed pending resolution of this motion.

Respectfully Submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah P. Spruill

J.W. Matthews III, S.C. Bar No. 68581

Sarah P. Spruill, S.C. Bar No. 68337

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Attorneys for Appellant

September 15, 2020
Greenville, South Carolina

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v.

RLI Insurance Company Third-Party Defendant

of which:

Carolina Cool, Inc. is the Respondent,
and

Garrard Construction Group, Inc. is the Appellant.

PROOF OF SERVICE

I certify that I have served the *Consent Motion for Extension of Time for Appellant to File Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal* on all attorneys of record by electronic mail only on September 15, 2020, addressed to:

<p>Robert T. Lyles rtl@lylesfirm.com Lyles and Associates, LLC 1037 Chuck Dawley Blvd., St. G-100 Mt. Pleasant, SC 29464</p>	<p>Mark David Neill mneill@neilllawfirm.com Mary Anna Neill maneill@neilllawfirm.com Neill Law Firm, PA P.O. Box 2810 Murrells Inlet, SC 29576</p>
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A handwritten signature in blue ink that reads "Janice M. Barry". The signature is written in a cursive style with a large initial "J" and "B".

Janice Barry, Legal Secretary
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ONE North Main Street, 2nd Floor
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September 15, 2020

VIA EMAIL ONLY (ctappfilings@sccourts.org)

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

RECEIVED

Sep 15 2020

SC Court of Appeals

Re: *Carolina Cool, Inc. v. Garrard Construction Group, Inc., et al.*
Appellate Case No.: 2020-000273


Dear Ms. Kitchings:

This firm represents the Appellant, Garrard Construction Group, Inc., in the above matter. Enclosed for filing, please find a *Consent Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter to be Included in the Record on Appeal*, together with our Proof of Service for the same. We have not included a filing fee consistent with the Supreme Court of South Carolina's Order dated March 20, 2020.

If you have any questions, please give me a call. Thank you for your assistance in this matter. Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadline be stayed pending resolution of this request.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/jmb
Enclosures

cc: Robert T. Lyles (via email only rtl@lylesfirm.com)
Mark David Neill (via email only mneill@neilllawfirm.com)
Mary Anna Neill (via email only maneill@neilllawfirm.com)