

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

JUN 24 2021

**SC Court of Appeals**

Joseph M. Strickland, Master-in-Equity Judge

Appellate Case No. 2018-001156  
Civil Action No. 2016-CP-40-00642

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

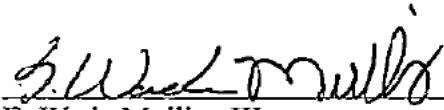
v.

Coogler Construction Company, Inc.....Respondent.

**MOTION FOR EXTENSION OF TIME FOR RESPONDENT TO FILE RETURN TO  
APPELLANT'S PETITION FOR REHEARING**

Respondent, by and through its undersigned attorney hereby moves this Honorable Court for a 10-day extension in which to file its Return to Appellant's Petition for Rehearing. The Return of Respondent is due on June 28, 2021. If the extension is granted, the Return of Respondent will be due on July 8, 2021. Counsel for Appellant has agreed to the 10-day extension. This motion is based on counsel's previously scheduled conflicts in other cases.

Respectfully submitted,



E. Wade Mullins III  
BRUNER, POWELL, WALL & MULLINS, LLC  
P.O. Box 61110  
Columbia, South Carolina 29260  
(803) 252-7693  
*Attorney for Respondent*

Columbia, South Carolina

June 24<sup>th</sup>, 2021

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Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.....Respondent.

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**PROOF OF SERVICE**

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I certify that I have served the **Motion for Extension of Time for Respondent to File Return to Appellant's Petition for Rehearing**, by deposition a copy of same in the United States

Mail, postage prepaid, on June 24, 2021, on the following parties, addressed as follow:

T. Jeff Goodwyn, Jr.  
Goodwyn Law Firm, LLC  
2309 Devine Street  
Columbia, SC 29205



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Lacey E. Segars  
Paralegal to E. Wade Mullins, III  
Bruner Powell Wall & Mullins, LLC  
PO Box 61110  
Columbia, SC 29260

June 24, 2021

BRUNER, POWELL, WALL & MULLINS, LLC

ATTORNEYS AND COUNSELORS AT LAW

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WARREN C. POWELL, JR., P.A.\*

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WESLEY D. PEEL, P.A.

JOEY R. FLOYD, P.A.

BENJAMIN C. BRUNER, P.A.

JAMES L. BRUNER (RETIRED)

\_\_\_\_\_  
CHELSEA J. CLARK

\* ALSO ADMITTED IN DISTRICT OF COLUMBIA

AUTHOR'S E-MAIL: LSEGARS@BRUNERPOWELL.COM

June 24, 2021

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court -The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**

JUN 24 2021

**SC Court of Appeals**

**Re: Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.  
vs. Coogler Construction Company, Inc.  
Appellate Case No. 2018-001156  
Our File No. 7-617.127**

Dear Ms. Kitchings:

Enclosed for filing please find an original and (1) one copy of a *Motion for Extension of Time for Respondent to File Return to Appellant's Petition for Rehearing* regarding the above referenced matter. I would appreciate it if you would file the original in your office and return a clocked copy with the courier. By copy of this letter, I am serving a copy of the *Motion for Extension of Time for Respondent to File Return to Appellant's Petition for Rehearing* upon T. Jeff Goodwyn, Jr., Esquire, counsel for the Appellant.

With my warmest regards, I am

Very truly yours,



Lacey E. Segars

Paralegal to E. Wade Mullins, III

Enclosures

cc: T. Jeff Goodwyn, Jr., Esquire (Via Han Delivery)

**BRUNER, POWELL, WALL & MULLINS, LLC**

*A Professional Limited Liability Company*

ATTORNEYS AND COUNSELORS AT LAW

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COLUMBIA, SOUTH CAROLINA 29260-1110

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