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Feb 12 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM AIKEN COUNTY

Court of Common Pleas

The Honorable Patrick C. Fant, III

Circuit Court Case No. 2023-CP-02-01719

Appellate Case No. 2024-002137

Deborah Denise Harley,

Respondent,

v.

D.R. Horton, Inc. and Plumbing
Solutions, LLC,

Defendants,

Of which D.R. Horton, Inc. is the

Appellant.

MOTION FOR AN EXTENSION

Counsel respectfully requests a thirty-day extension to file Appellant's Initial Brief and Designation of Matter in the above captioned matter. This request is based on the number and complexity of the legal issues in this matter and deadlines in other matters. Currently, the deadline to file Appellant's Initial Brief and Designation of Matter is set for February 18, 2025. If granted, the new deadline to file will be March 20, 2025. For these reasons, counsel requests the motion be granted and all deadlines held in abeyance until the Court rules on this motion.

[SIGNATURE ON FOLLOWING PAGE]

Sincerely,

/s/ David L. Paavola

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Kimila L. Wooten, SC Bar No.: 64516

David L. Paavola, SC Bar No.: 100714

W. Jacob Henerey, SC Bar No.: 102268

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Attorneys for Appellant

February 12, 2025

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Defendants,

Of which D.R. Horton, Inc. is the

Appellant.

PROOF OF SERVICE

I certify that the Appellant's Motion for Extension has been served by email on all counsel of record as follows. A copy of the sent email is enclosed as **Exhibit 1** with this Proof of Service.

/s/ David L. Paavola

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Counsel for Plumbing Solutions, LLC

EXHIBIT 1

From: [Natascha Genc](#)
To: rtl@lylesfirm.com; jdw@lylesfirm.com
Cc: cchase@ycrlaw.com; bdennis@ycrlaw.com; [John Crawford](#); [Kim Wooten](#); [David Paavola](#); [Kathryn Harden](#); [Jacob Heneray](#); [Amelia Farmer](#); [Angelia Shaw](#); [Cara Smith](#); [April Gonzalez](#)
Subject: RE: Deborah Denise Harley v D.R. Horton, Inc. and Plumbing Solutions, LLC (Case No. 2024-002137)
Date: Wednesday, February 12, 2025 3:20:00 PM
Attachments: [image001.png](#)
[25.02.12 Motion for Extension re Initial Brief - Harley.pdf](#)

Dear Counsel:

Attached please find a Motion for an Extension regarding Deborah Denise Harley v D.R. Horton, Inc. and Plumbing Solutions, LLC (Case No. 2024-002137). We plan on filing this in the Court of Appeals shortly.

With kindest regards,

****PLEASE NOTE THAT OUR GREENVILLE OFFICE IS NOW LOCATED AT 325 W. MCBEE AVENUE, SUITE 301, GREENVILLE, SC 29601. ****



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