

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 21-day extension to file Appellant's Reply 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. Counsel has consulted with counsel for Respondent, and they do not object to the request. Currently, the deadline to file Appellant's Reply Brief and Designation of Matter is set for June 2, 2025. If granted, the new deadline to file will be June 23, 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

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May 30, 2025

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Appellant.

PROOF OF SERVICE

I certify that 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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EXHIBIT 1

From: [Natascha Genc](#)
To: rtl@lylesfirm.com; jdw@lylesfirm.com; cchase@ycrlaw.com; bdennis@ycrlaw.com
Cc: [John Crawford](#); [Kim Wooten](#); [David Paavola](#); [Jacob Henerey](#); [Amelia Farmer](#); [Angelia Shaw](#); [Cara Smith](#)
Subject: RE: Deborah Denise Harley v D.R. Horton, Inc. and Plumbing Solutions, LLC (Case No. 2024-002137)
Date: Friday, May 30, 2025 8:30:00 AM
Attachments: [25.05.30 Motion for Extension re Reply Brief - Harley.pdf](#)
[image001.png](#)

Dear Counsel:

Attached please find a Motion for an Extension to file Appellant's Reply Brief 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,



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