

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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**Jul 02 2025**

**S.C. SUPREME COURT**

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

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Case No. 2017-CP-42-00740  
Appellate Case No. 2025-000682

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Gibbs International, Inc., ..... Petitioner,

v.

Sarmad Harake, Eurosa, Inc., and Katherine Harake, ..... Defendants

Of whom Sarmad Harake and Eurosa, Inc. are the ..... Respondents.

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**PETITIONER GIBBS INTERNATIONAL, INC.’S  
FIRST MOTION FOR EXTENSION OF TIME TO FILE REPLY TO RESPONDENTS’  
RETURN TO THE PETITION FOR A WRIT OF CERTIORARI**

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Pursuant to Rule 240(a) of the South Carolina Appellate Court Rules, Petitioner Gibbs International, Inc. (“Gibbs”), with the consent of Respondents Sarmad Harake and Eurosa, Inc. (collectively, “Respondents”), respectfully requests an extension of time of ten (10) days to file its Reply to Respondents’ Return to the Petition for a Writ of Certiorari.

Gibbs filed its Petition for a Writ of Certiorari on April 10, 2025. Thereafter, Respondents filed two motions for extension of time within which to file their Return to Gibb’s Petition for a Writ of Certiorari. The Court granted both of Respondents’ Motions for Extensions of Time and

extended their time to file a Return by a total of forty (40) days. On June 27, 2025, Respondents' filed their Return to Gibbs' Petition for a Writ of Certiorari. Pursuant to Rule 242(g), SCACR, Gibbs' Reply to the Respondents' Return is due to be filed with the Court on or before July 7, 2025.

As a result of Gibbs' counsels' work schedule and the intermediate holiday which falls in the middle of Gibbs' allotted time to draft and file its Reply, Gibbs respectfully contends that good cause exists for a ten (10) day extension of time to file its Reply to the Respondents' Return to the Petition for a Writ of Certiorari.

This is Gibbs' first motion for an extension of time. Counsel for Gibbs have conferred with Counsel for the Respondents, and Respondents consent to this motion.

WHEREFORE, Gibbs respectfully requests the Court issue an Order granting its request for an extension of time of ten (10) days within which to file its Reply to Respondents' Return to Gibbs' Petition for a Writ of Certiorari.

*/s/ Kevin A. Dunlap*

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July 1, 2025