

RECEIVED

Aug 22 2025

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Honorable Jennifer B. McCoy, Circuit Court Judge

Civil Action No. 2016-CP-10-03738
Appellate Case No. 2025-001496

Dag Pavic and Stela Susac-Pavic.....Plaintiffs,
v.
Carolina Cottage Homes, LLC d/b/a Saussy Burbank; SB Holding, LLC d/b/a Saussy Burbank;
Saussy Burbank GC, LLC; American Residential Services, LLC; Builders FirstSource-Southeast
Group, LLC; Hurley Services, LLC; Simons Contractors, LLC and Cohen’s Drywall Company,
Inc.,Defendants,

of which Hurley Services, LLC is theRespondent

AND

Builders FirstSource-Southeast Group, LLC,Petitioner,
v.
MW Manufacturers, Inc.,.....Third-Party Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE RETURN TO PETITION FOR WRIT
OF CERTIORARI**

The undersigned counsel hereby moves, pursuant to Rule 263(b), SCACR, and this Court’s order dated July 16, 2014, to extend for ten (10) days the deadline for Respondent Hurley Services, LLC’s return to Petitioner Builders FirstSource-Southeast Group, LLC’s Petition for Writ of Certiorari. The current deadline is Monday, August 25, 2025. If this motion is granted, the new deadline will be Thursday, September 4.

This matter is subject to Petitioner's pending Motion to Stay, which was filed on July 21, 2025. The Court has not yet ruled on that motion. If granted, Hurley Services, LLC would benefit from avoiding the expense and inconvenience of preparing a return until that stay is lifted.

Moreover, Hurley's return will likely take more time to prepare than is typical. The undersigned is familiar with this Court's order of July 16, 2014, which advises that "in most cases, the preparation of the ... return will involve no more than taking the arguments already made in the briefs before the Court of Appeals" and providing minor updates. However, this Petition for Writ of Certiorari contains several arguments that, although generally raised to the court below, rely on previously uncited case law. Accordingly, Hurley Services, LLC's return requires additional effort to provide a complete record. Finally, this extension is requested due to the undersigned counsel's unusually demanding schedule during the previous thirty (30) day period.

Hurley Services, LLC has not previously sought an extension for the filing date of its return to the Petition for Writ of Certiorari. Counsel for Petitioner consents to this extension of time. Respondents anticipate no prejudice to the parties to this appeal arising from this delay.

HOLCOMBE BOMAR, P.A.
P.O. Box 1897
Spartanburg, SC 29304
(864) 594-5300

By: *s/ Todd Russell Flippin*

Todd Russell Flippin (S.C. Bar No. 101197)
Attorneys for Hurley Services, LLC

Spartanburg, South Carolina

August 22, 2025