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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 twenty (20) 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 September 4, 2025. If this motion is granted, the new deadline will be today, September 24.

On September 11, 2025, this Court denied Petitioner's Motion to Stay these proceedings in order to allow the Court to hear and decide *Builders FirstSource- Southeast Group, LLC v. Palmetto Trim and Renovations*, Case No. 2025-001224. Respondent sought an extension of this deadline on a single prior occasion, which request this Court granted. However, due to a clerical error, the amended response date was improperly calendared.

As anticipated, Respondent's return took considerably 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 sixty (60) day period.

Respondents anticipate no prejudice to the parties to this appeal arising from this delay.

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By: *s/ Todd Russell Flippin*

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September 24, 2025