

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

H. Steven DeBerry, IV, Circuit Court Judge

Case No.: 2020-CP-21-01817

Appellate Case No.: 2023-001713

RECEIVED

Oct 14 2025

SC Court of Appeals

Barbara L. SarbRespondent/Appellant,

v.

Julie W. Phillips and Joseph M. PhillipsAppellants/Respondents.

**MOTION FOR EXTENSION OF TIME FOR APPELLANTS/RESPONDENTS TO FILE
RETURN ON RESPONDENT/APPELLANT’S MOTION FOR COSTS**

Pursuant to Rule 240, SCACR, Appellants/Respondents Julie W. Phillips and Joseph M. Phillips hereby move, with the consent of counsel for Respondent/Appellant, for an extension of time within which they may file their response to Respondent/Appellant’s Motion for Costs. The return deadline was September 29, 2025 and the return was filed October 3, 2025. The extension sought will not prejudice any other party. The undersigned has contacted opposing counsel who does not consent to the extension. Granting this motion would allow the court to consider the return filed on October 3, 2025.

(Signature to follow on next page.)

October 14, 2025

s/ Edward A. Love
EDWARD A. LOVE
Post Office Box 1764
135 South Dargan Street, Suite 201
Florence, SC 29503
(843) 407-5525 – Tel
Attorney for
Appellants/Respondents

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

H. Steven DeBerry, IV, Circuit Court Judge

Case No. 2020-CV-21-01817

Appellate Case No. 2023-001713

RECEIVED

Oct 14 2025

SC Court of Appeals

Barbara Sarb.....Respondent/Appellant,

v.

Julie W. Phillips and Joseph M. Phillips.....Appellants/Respondents.

PROOF OF DELIVERY

The undersigned hereby certifies that on October 14, 2025:

**MOTION FOR EXTENSION OF TIME FOR APPELLANTS/RESPONDENTS TO FILE
RETURN ON RESPONDENT/APPELLANT’S MOTION FOR COSTS**

was served on counsel for Respondent/Appellant by electronic means to the following addresses:

Valerie G. Giovanoli, S.C. Bar No. 102524

Valerie.Giovanoli@mccabetrotter.com

Fiona R. Reed, S.C. Bar No. 104732

Fiona.reed@mccabetrotter.com

s/Edward A. Love

EDWARD A. LOVE #75118

elove@kingandlove.com

ATTORNEYS FOR
APPELLANTS/RESPONDENTS

October 14, 2025