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Oct 16 2025

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
The Honorable R. Lawton McIntosh

Case No. 2020-CP-04-00085
Appellate Case No. 2024-001911

Moats Construction, Inc. and Russell Moats,

Appellants,

v.

Anderson County, Rusty Barns, Matt Schell, and Holt Hopkins,

Respondents.

MOTION FOR AN EXTENSION

Counsel respectfully requests a fourteen-day (14) extension to file Appellants' Initial Brief and Designation of Matter in the above captioned matter, currently due October 22, 2025. This request is based on multiple professional obligations during this same period, including multiple appellate briefs filed in recent weeks and others due in the coming weeks, a currently scheduled trial in magistrate's court on October 21, 2025, mediation in an unrelated case on October 23, 2025, and additional court-imposed deadlines.

Counsel for Anderson County does not object to this requested extension.

This request is made in good faith, not for the purpose of delay, and no party will be prejudiced by the granting of this short extension. Accordingly, Appellant respectfully requests that the Court grant a fourteen (14) day extension, extending the deadline to file Appellant's Initial Brief and Designation of Matter to November 5, 2025. For these reasons, counsel requests the motion be granted and all deadlines held in abeyance until the Court rules on this motion.

Respectfully submitted,

/s/ David L. Paavola
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Attorneys for Appellants

October 16, 2025
Cayce, South Carolina

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PROOF OF SERVICE

I certify that the Appellants' Motion for Extension has been served on John W. Davidson, counsel for Respondent Anderson County by email sent to his primary e-mail address listed in the Attorney Information System, jdavidson@maynardnexsen.com and on James W. Logan, Jr., counsel for Respondents, Rusty Burns, Matt Schell, and Holt Hopkins, by email sent to his primary e-mail address listed in the Attorney Information System, logan@logalnandjolly.com, on October 16, 2025.

s/ David L. Paavola

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October 16, 2025

Attorney for Appellants