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Nov 17 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. 2024-CP-04-02229
Appellate Case No. 2025-001549
Appellate Case No. 2025-002012

Moats Construction, Inc. and The Green Man, LLC,

Appellants,

v.

APB Partnership, LLC, Wesley Edwards, 2916 N. Main, LLC, W.H. Bass, Inc., Whataburger Restaurants, LLC, and United Community Bank,

Respondents.

MOTION FOR EXTENSION

Counsel for Appellants respectfully moves for a thirty (30) day extension of time within which to file Appellants' Initial Brief and Designation of Matter in the above captioned matter. This request is made in light of counsel's existing deadlines in other pending matters and a pending Motion to Consolidate Appellate Nos: 2025-001549 and 2025-002012, which was filed on November 12, 2025, and remains pending before the Court. The current deadline for filing Appellants' Initial Brief and Designation of Matter is November 18, 2025. If granted, the new filing deadline would be December 18, 2025. Accordingly, Appellants respectfully request that

this Motion for Extension of Time be granted, and that all applicable deadlines be held in abeyance pending the Court's ruling on this motion.

Respectfully submitted,

/s/ David L. Paavola

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Attorneys for Appellants

November 17, 2025
Cayce, South Carolina

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Case No. 2024-CP-04-02229
Appellate Case No. 2025-001549
Appellate Case No. 2025-002012

Moats Construction, Inc. and Russell Moats,

Appellants,

v.

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

Respondents.

PROOF OF SERVICE

I certify that the Appellants' Motion for Extension has been served on Daniel L. Draisen, counsel for Respondents APB Partnership, LLC, Wesley Edwards, and 2619 N. Main, LLC, by email sent to his primary e-mail address listed in the Attorney Information System, daniel@injuredsc.com, Paul H. Hoefler and C. Elizabeth Weston, counsel for Respondent United Community Bank, by email sent to their primary e-mail addresses listed in the Attorney Information System, phoefler@robinsongray.com and lweston@robinsongray.com, and Christopher B. Major, counsel for Whataburger Restaurants, LLC, by email sent to his primary e-mail address listed in the Attorney Information System, cmajor@hsblawfirm.com, on November 17, 2025.

s/ David L. Paavola

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