

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

RECEIVED

Nov 25 2025

SC Court of Appeals

Moats Construction, Inc. and Russell Moats,

Appellants,

v.

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

Respondents.

RESPONDENTS' RUSTY BURNS, MATT SCHELL AND HOLT HOPKINS,
MOTION FOR EXTENSION OF TIME

Respondent's Rusty Burns, Matt Schell and Holt Hopkins respectfully request a thirty (30) day extension to file their Initial Response Brief in this matter. Respondents Brief is currently due on December 4, 2025. With the granting of this extension, Respondents Brief will be due on January 5, 2026.

At this time, it does not appear that Matt Schell or Holt Hopkins are included in this appeal. However, out of an abundance of caution, counsel has included them in this request for an extension as he would be representing them if it is determined that they are included in this appeal.

Counsel for Respondents has just recently become involved in this matter due to the retirement of J. Victor McDade, prior counsel for Respondents. Counsel requests this extension to allow time to review the matter and prepare the response.

WHEREFORE, Respondents respectfully request that the Court grant this Motion and extend the deadline for filing Respondents' Initial Brief until January 5, 2026 and grant such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Willson Jones Carter & Baxley

s/James W. Logan, Jr.
James W. Logan, Jr.
S.C Bar #3385
Post Office Box 259 (29622)
Anderson, South Carolina
(864) 934-6782
Attorneys for Respondents Burns, Schell and Hopkins

Dated: 11-25-2025

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PROOF OF SERVICE

I, James W. Logan, Jr., attorney for Respondents Rusty Burns, Matt Schell and Holt Hopkins do certify that I have served Respondents' Motion for Extension of Time upon all counsel, by electronic mail, addressed as follows:

Paavola@conlaw.com
Jdavidson@maynardnexsen.com

Respectfully Submitted,

Willson Jones Carter & Baxley

s/James W. Logan, Jr.

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