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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 Edgar W. Dickson, Circuit Court Judge

Appellate Case No. 2025-002188
Court of Appeals Appellate Case No. 2023-001779

Andrew Pampu, Amanda Pampu, and John Pampu, Petitioners-Respondents,

v.

Clawson Fagnoli, LLC, Samuel R. Clawson, Jr., Esq., Christina R. Fagnoli, Esq., Barrett R. Brewer, Esq., and Brewer Law Firm, LLC, Respondents-Petitioners.

**JOINT MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENTS-PETITIONERS' RETURN TO PETITION**

Respondents-Petitioners Clawson Fagnoli, LLC; Samuel R. Clawson, Jr., Esq.; Christina R. Fagnoli, Esq.; Barrett R. Brewer, Esq.; and Brewer Law Firm, LLC, pursuant to Rule 240, SCACR, respectfully jointly move for an order briefly extending the deadline to file and serve their Return to Petition to December 12, 2025. In support of this motion, Respondents-Petitioners would show as follows:

1. Petitioners-Respondents Andrew Pampu, Amanda Pampu, and John Pampu filed their Petition for Writ of Certiorari on October 29, 2025. Pursuant to Rule 242(f), Respondents-Petitioners have thirty (30) days from the date of filing the

Petition to file and serve their Return to the Petition. Accordingly, Respondents-Petitioners' Response brief is presently due on or before November 28, 2025.

2. A modest extension of this deadline is necessary due to counsel's case schedule and workload and the upcoming Thanksgiving holiday.

3. An extension of fourteen days—to December 12, 2025—would enable Respondents-Petitioners to file a Return that comprehensively and succinctly addresses the multiple issues raised in the Petitioners-Respondents' Petition.

4. Counsel for Petitioners-Respondents consents to this extension.

5. Respondents-Petitioners recognize that under this Court's Order of July 16, 2014, extensions during the certiorari stage are disfavored and should be strictly limited. Respondents-Petitioners' counsel certify that this extension request is for the minimum amount of time needed and is not made for purposes of delay.

CONCLUSION

For the reasons set forth above, Respondents-Petitioners respectfully request entry of an order extending the deadline for their Return to Petition to December 12, 2025.

Respectfully Submitted,

/s/ Emily E. Seaton

James M. Dedman, IV (S.C. Bar No. 70664)

Emily E. Seaton (S.C. Bar No. 104548)

GALLIVAN, WHITE & BOYD, P.A.

6805 Carnegie Blvd., Suite 200

Charlotte, NC 28211

(704) 552-1712 (Telephone)

(704) 362-4850 (Fax)

jjedman@gwblawfirm.com

eseaton@gwblawfirm.com

*Attorneys for Respondents Clawson Fagnoli, LLC,
Samuel R. Clawson, and Christina R. Fagnoli*

And

/s/ R. Bruce Wallace

R. Bruce Wallace (S.C. Bar No. 11653)

MAYNARD NEXSEN, P.C.

205 King Street, Suite 400

Charleston, SC 29401

(843) 577-9440 (Telephone)

(843) 720-1777 (Fax)

bwallace@maynardnexsen.com

*Attorneys for Respondents Barrett R. Brewer, Esq.
and Brewer Law Firm, LLC*