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Dec 31 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. 202-CP-04-00085
Appellate Case No. 2024-001911

Moats Construction, Inc. and Russell Moats,

Appellants,

vs.

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

Respondents.

**SECOND MOTION FOR EXTENTION OF TIME ON
BEHALF OF RESPONDENT, ANDERSON COUNTY**

Respondent Anderson County respectfully requests an additional thirty (30) day extension to file its Initial Response Brief and Designation of Matter in this matter. Respondent's Brief and Designation are currently due on January 6, 2026. With the granting of this extension, Respondent's Brief and Designation will be due on February 5, 2026. The basis for this request is to allow additional time for counsel to properly prepare the County's response and to allow additional time for further consultation with Anderson County that has been hampered by the holidays. We appreciate your consideration of this request.

WHEREFORE, Respondent Anderson County respectfully requests that the Court grant this Motion and extend the deadlines for filing Respondent's Initial Brief and Designation of Matter until February 5, 2026, and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

s/ John W. Davidson

John W. Davidson, SC Bar No. 8494

MAYNARD NEXSEN PC

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Attorneys for Respondent Anderson County

December 30, 2025
Columbia, South Carolina

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PROOF OF SERVICE

I, John W. Davidson, attorney for Respondent Anderson County, do certify that I have served Respondent's Second Motion for Extension of Time upon all counsel of record, by electronic mail, addressed as follows:

Paavola@conlaw.com
jwlogan@wjcblaw.com

Respectfully submitted,

s/ John W. Davidson

John W. Davidson, SC Bar No. 8494

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Attorneys for Respondent Anderson County