

**RECEIVED**

**Dec 31 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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

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Moats Construction, Inc. and Russell Moats,

Appellants,

v.

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

Respondents.

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

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

The basis for this request is for counsel to have additional time to prepare his response on behalf of these Respondents and to allow further time to review the trial transcript and exhibits and meet with his clients.

WHEREFORE, Respondents respectfully request that the Court grant this Motion and extend the deadline for filing Respondents' Initial Brief until February 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: 12-31-2025

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RESPONDENTS' RUSTY BURNS, MATT SCHELL AND HOLT HOPKINS,  
PROOF OF SERVICE

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

[Paavola@conlaw.com](mailto:Paavola@conlaw.com)  
[Jdavidson@maynardnexsen.com](mailto:Jdavidson@maynardnexsen.com)

Respectfully Submitted,

**Willson Jones Carter & Baxley**

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Dated: 12-31-2025