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Dec 31 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

The Honorable W. Haigh Porter, Master-in-Equity

Case No. 2024-CP-21-02667
Appellate Case No. 2025-001567

PennyMac Loan Services, LLCRespondent,

v.

Troy Pugh; Kitre Pugh, Individually;
Kitre Pugh, as Personal Representative
of the Estate of Sylvia Ann Pugh; Libre
Timmons; and Cypress Point Owners
Association, Inc..... Defendants.

of which Kitre Pugh, Individually, and Kitre Pugh, as Personal Representative of the
Estate of Sylvia Ann Pugh, are the Appellants.

**MOTION FOR EXTENSION OF TIME
TO FILE RESPONDENT’S INITIAL BRIEF AND
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Respondent PennyMac Loan Services, LLC, respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter to be Included in the Record on Appeal. Respondent’s Initial Brief and Designation of Matter is currently due on January 5, 2026.

However, by letter of December 18, 2025, the Court gave Appellant 10 days from the date of that letter to file and serve a corrected appellant’s initial brief to address several deficiencies. As of today, Respondent has not yet been served with a corrected appellant’s initial brief.

By Order of December 18, 2025, the Court gave Appellant 10 days from the date of the Order for the Appellant to provide the Court with the date that the transcript was received. As of today, Respondent has not been provided with notice of Appellant's compliance with that Order.

Respondent therefore respectfully requests this extension to see if the Court will dismiss this appeal due to Appellant's failure to comply with either the Court's letter or Order of December 18, 2025. In addition, counsel for Respondent is under an unusually heavy workload.

This is Respondent's first request for an extension. A thirty (30) day extension would make Respondent's Initial Brief and Designation of Matter due on February 4, 2026.

Based on the foregoing, Respondent would respectfully request a thirty (30) day extension of time to file Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

s/ Sean M. Foerster
Sean M. Foerster (SC Bar# 77466)
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Counsel for Respondent PennyMac Loan
Services, LLC

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PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to File Respondent’s Initial
Brief and Designation of Matter to be Included in the Record on Appeal on Appellants Kitre Pugh,
Individually, and Kitre Pugh, as Personal Representative of the Estate of Sylvia Ann Pugh, by
depositing a copy of it in the United States Mail, postage prepaid, on December 31, 2025,
addressed to both 700 S. Cashua Drive, Apt 11A, Florence, SC, 29501, and to 46 Niagara Street,
Waterbury, CT 06705.

s/ Sean M. Foerster
Sean M. Foerster (SC Bar# 77466)
ROGERS TOWNSEND LLC