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Feb 18 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Trial Court Case No. 2017CP4202374

Appellate Case No. 2025-002400
Consolidated with No. 2025-002050

Richard Lewis and Walter
Lewis
Appellants

v.
Robert M. Errato and Quinpiac
Associates, Inc.
Respondents,

of which Robert M. Errato is the
Respondent herein

OBJECTION TO MOTION FOR EXTENSION OF TIME OR ALLOW LATE FILING

Respondent Robert M. Errato ("Respondent") hereby objects to the Motion for Extension of Time or to allow a late filing filed by Appellants, by and through their counsel, Attorney Jason M. Imhoff filed on or about February 12, 2026. In further support thereof, Respondent states as follows:

On January 6, 2026, Respondent filed a Motion to Dismiss the appeal in this case, claiming that Appellant's case is frivolous and unmeritorious. Respondent filed such motion with the court on said date and also filed a Proof of Service. *See Exhibit A*, Proof of Service filed January 6, 2026. In such Proof of Service, Respondent specifically asserts that he sent a copy of the Motion to Dismiss to Appellants' attorney of record, Jason Imhoff. In the Proof of Service, as this Court can see, Respondent stated that he would send a copy of such motion either via U.S. Mail "and/or email."

Previously, Respondent had email communication with Attorney Imhoff. On October 21, 2025, Attorney Imhoff stated to Respondent: "If you want to serve me with something email it to me.... It will save us both time." *See Exhibit B*, email from Attorney Jason Imhoff. Therefore, in following Attorney Imhoff's instructions, Respondent emailed to him a copy of the Motion to Dismiss on January 6, 2026.

In his Motion for Extension of Time, however, Attorney Imhoff now claims that he never received the Motion via U.S. Mail and, therefore, asks for additional time to respond. Respondent objects to such characterization. Respondent served Attorney Imhoff in the manner in which he requested. Therefore, Appellants' Motion for Extension is merely a delay tactic. In his Motion to Dismiss, Respondent has already argued that the entire appeal is a delay tactic with an unmeritorious argument allowing a Lis Pendens on property for which Appellants have no interest. This Motion for Extension of Time is simply another way to delay this case, cause prejudice to Respondent, and force Respondent to incur further time and resources in bringing this case to its completion.

WHEREFORE, Respondent objects to any additional time given to the Appellants in this case. Appellants' attorney was properly served with a copy of the Motion to Dismiss in

the manner in which Attorney Imhoff requested to be served. His representations to the Court are merely a delay tactic designed to prejudice the Respondent. Thus, Respondent requests that this Court deny Appellants' Motion for Extension of Time Or Allow Late Filing.

February 18, 2026

s/ Robert M. Errato
Robert M. Errato
3000 Whitney Avenue, PMB 109
Hamden, CT 06518
(203) 494-5141
Pro Se

Other Counsel of Record:
Jason M. Imhoff
37 Villa Rd Ste 420
Greenville, SC 29615
Jason@Imhoff-Law.com
(864) 412-1984

PROOF OF SERVICE

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PROOF OF SERVICE

I certify that I have served the OBJECTION TO MOTION FOR EXTENSION OF TIME OR ALLOW LATE FILING on RICHARD LEWIS, et al by e-mailing, on February 18, 2026, addressed to the attorney of record, JASON M. IMHOFF, 37 VILLA RD STE, 420 GREENVILLE, SC 29615, Jason@Imhoff-Law.com.

February 18, 2026

s/ Robert M. Errato
Robert M. Errato
3000 Whitney Avenue, PMB 109
Hamden, CT 06518
(203) 494-5141
Pro Se

EXHIBIT A

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Robert M. Errato and Quinnipiac
Associates, Inc.
Respondents,

of which Robert M. Errato is the
Respondent herein

PROOF OF SERVICE

I certify that I have served the MOTION TO DISMISS THE APPEAL on RICHARD LEWIS, et al by depositing a copy of it in the United States Mail, Certified postage prepaid and/or e-mail, on January 6, 2026, addressed to the attorney of record, JASON M. IMHOFF, 37 VILLA RD STE, 420 GREENVILLE, SC 29615.

January 6, 2026

s/ Robert M. Errato
Robert M. Errato
3000 Whitney Avenue, PMB 109
Hamden, CT 06518
(203) 494-5141
Pro Se

EXHIBIT B

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Feb 18 2026

SC Court of Appeals



Jason Imhoff

RE: Request for Motion for Extension of time

To: robert errato

October 21, 2025 at 3:58 PM



Siri Found an Email

Jason Imhoff
jason@imhoff-law.com

Update

We object.

If you want to serve me with something email it to me with an acceptance of service instead of sending it via registered mail. It will save us both time.

Jason Imhoff
Imhoff Law Firm
(d) 864-412-1963
37 Villa Rd. Ste. 420
Greenville, SC 29615
Jason@Imhoff-Law.com

See More from robert errato