

**From:** [David Paavola](#)  
**To:** [Beckman, Lavianca](#); [Brian Autry](#); [Caitlin Cameron](#); [Daniel Draisen](#); [john@bluesteinattorneys.com](#); [phoefer@robinsongray.com](#); [lweston@robinsongray.com](#); [dana.lang@wbd-us.com](#); [cmajor@hsblawfirm.com](#); [Court Of Appeals Filings](#)  
**Cc:** [Angelia Shaw](#); [April Gonzalez](#); [kathy@injuredsc.com](#); [meredith@bluesteinattorneys.com](#); [hoefer@sowellgray.com](#); [westonfilinggroup@robinsongray.com](#); [leanna.romeo@wbd-us.com](#); [efile\\_cmajor@hsblawfirm.com](#)  
**Subject:** Re: Moats Construction, Inc. v. APB Partnership, LLC (2025-002012)  
**Date:** Thursday, February 19, 2026 12:55:49 PM  
**Attachments:** [Outlook-KDCv4.png](#)  
[20260219\\_Return Resp Mot Add'l Time\\_FINAL.pdf](#)

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Ms. Beckman:

I am filing our opposition to Respondents' Motion to File Out of Time. I realize that the Court has already granted this motion in today's order, but it was granted before our response date, which is today, so we ask that the Court consider our response.

Sincerely,



**David L. Paavola**

Attorney

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**Cayce, SC 29033**

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**From:** Beckman, Lavianca <lbeckman@sccourts.org>

**Sent:** Thursday, February 19, 2026 12:10 PM

**To:** David Paavola <paavola@conlaw.com>; Brian Autry <autry@conlaw.com>; Caitlin Cameron <cameron@conlaw.com>; Daniel Draisen <daniel@injuredsc.com>; john@bluesteinattorneys.com <john@bluesteinattorneys.com>; phoefer@robinsongray.com <phoefer@robinsongray.com>; lweston@robinsongray.com <lweston@robinsongray.com>; dana.lang@wbd-us.com <dana.lang@wbd-us.com>; cmajor@hsblawfirm.com <cmajor@hsblawfirm.com>

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**Subject:** Moats Construction, Inc. v. APB Partnership, LLC (2025-002012)

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Dear Counsel,

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Regards,



**Lavianca (Lavi) Beckman**  
**Appeals Specialist**  
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Columbia, SC 29201  
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