

RECEIVED

Feb 24 2026

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

Appellate Case No. 2026-000104

The Honorable Joseph Kershaw Spong
Special Referee, Lexington County

Trial Court Case No. 2023-CP-3202327

PennyMac Loan Services, LLC, Respondent,

Judith A. Kelly; Judith-Ann Kelly as
co-trustee of Judith Ann Kelly Family Trust;
Ann Cornell as cotrustee of Judith Ann Kelly
Family Trust; and South Brook Community
Association, Inc, Defendants,

of which

Judith-Ann Kelly, individually and as
co-trustee of Judith Ann Kelly Family Trust
is the Petitioner.

MOTION FOR EXTENSION OF TIME

Respondent, PennyMac Loan Services, LLC respectfully moves this Court for an extension of time by twenty (20) days to file its return to the Petition for Writ of Certiorari filed by Petitioner Judith Ann Kelly due to deadlines pending in other matters, including other matters presently before this Court. Respondent mistakenly believed that the Court had already denied certiorari review in this matter by virtue of an earlier order of denial, and it wishes to oppose the subsequent petition that Ms. Kelly has since filed. If granted, Respondent’s deadline for filing its response would be March 10, 2026.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: /s/ M. Todd Carroll
M. Todd Carroll
S.C. Bar No. 74000
kevin.hall@wbd-us.com
Levi W. Wright
S.C. Bar No 107817
levi.wright@wbd-us.com
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-6504

Counsel for Respondent

February 24, 2026
Columbia, South Carolina