

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Brian M. Gibbons, Circuit Court Judge

**RECEIVED**

**Feb 27 2026**

**S.C. SUPREME COURT**

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Case No. 2017-CP-42-00740  
Appellate Case No. 2025-000682

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Gibbs International, Inc., .....Petitioner,

v.

Sarmad Harake, Eurosa, Inc., and Katherine Harake, ..... Defendants

Of whom Sarmad Harake and Eurosa, Inc. are the ..... Respondents.

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**PETITIONER GIBBS INTERNATIONAL, INC.’S  
MOTION FOR EXTENSION OF TIME TO  
FILE THE PETITIONER’S REPLY BRIEF**

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Pursuant to Rules 240(a) and 263(b) of the South Carolina Appellate Court Rules, Petitioner Gibbs International, Inc. (“Gibbs”), with the consent of Respondents Sarmad Harake and Eurosa, Inc. (collectively, “Respondents”), respectfully requests a ten (10) day extension of time to serve and file the Petitioner’s Reply Brief.

The Court issued an order granting Gibbs’ Petition for a Writ of Certiorari on November 18, 2025. Gibbs filed a motion for twenty-day extension of time to file the Petitioner’s Brief which was granted by the Court, and Gibbs filed the Petitioner’s Brief on January 7, 2026. Thereafter, Respondents filed a motion for extension of time requesting an additional forty-five (45) days to file the Respondents’ Brief. The Court granted the Respondents’ motion and provided

Respondents with twenty (20) days to file the Respondents' Brief and established February 26, 2026 as the deadline for filing the Respondents' Brief. Pursuant to Rules 242(i) and 263 of the South Carolina Appellate Court Rules, Gibbs' Reply Brief is due to be served and filed on or before Monday, March 9, 2026.

As stated in Gibbs's Motion for Extension of Time to file the Petitioner's Brief, Gibbs's counsel's wife passed away from a brain tumor a few years ago and he is the single parent to a college freshman. Gibbs's counsel's child will be home from school on Spring Break between February 27, 2026 and March 8, 2026. Gibbs's counsel's familial responsibilities and work schedule during the period in which the Petitioner's Reply Brief must be drafted and filed constitute good cause for the Court to grant Gibbs's request for a ten (10) day extension of time to file the Petitioner's Reply Brief. Otherwise, Gibbs's counsel will have one (1) business day—Friday, February 27, 2026—on which he does not have his additional familial obligations combined with his usual work schedule and professional obligations. Accordingly, Gibbs respectfully contends that good cause exists for a ten (10) day extension of time to file the Petitioner's Reply Brief.

Counsel for Gibbs have conferred with Counsel for the Respondents, and Respondents consent to this request for an extension of time to file the Petitioner's Reply Brief.

WHEREFORE, Gibbs respectfully requests the Court issue an Order granting its request for an extension of time of ten (10) days within which to file its Petitioner's Reply Brief, up to and including Thursday, March 19, 2026.

[SIGNATURE ON FOLLOWING PAGE]

*s/Kevin A. Dunlap*

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February 27, 2026