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Aug 19 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace G. Knie, Circuit Court Judge

Appellant Case No. 2025-002050
Lower Court Case No. 2017-CP-42-02374

Richard Lewis and Walter Lewis, Respondents/Appellants,

v.

Robert M. Errato, Quinnipiac Associates, Inc. and Upwards Builders, Inc., Defendants,

Of Which Robert M. Errato..... Appellant/Respondent.

MOTION FOR EXTENSION OF TIME OR ALLOW LATE FILING

The undersigned does hereby move, Pursuant to Rule 263(b) of South Carolina Appellate Court Rules, for an Order extending the time within which the Respondents/Appellants shall file and serve the Respondents/Appellants' Final Brief on the Appellant/Respondent in the above-captioned matter. The undersigned respectfully requests an additional thirty (30) days within which to file and serve such matters, which would make the Respondents/Appellants' Final Brief due on September 9, 2026.

Respectfully submitted,

IMHOFF LAW FIRM, LLC

s/ Jason M. Imhoff

Jason M. Imhoff (SC Bar # 69355)

37 Villa Road, Suite 420

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Telephone: (864) 412-1963

jason@imhoff-law.com

*Attorney for Respondents/Appellants Richard Lewis
and Walter Lewis*

August 19, 2026

Pro Se Appellant/Respondent:

Robert M. Errato

3000 Whitney Avenue

PMB 109

Hamden, CT 06518

Appellant/Respondent

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PROOF OF SERVICE

I certify that I have served the Motion for Extension on Robert M. Errato by depositing a copy of it in the United States Mail, postage prepaid, and electronic mail on August 19, 2026, addressed to Robert M. Errato, 3000 Whitney Avenue, PMB 109, Hamden, CT 06518.

August 19, 2026

s/ Jason M. Imhoff

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*Attorney for Respondents/Appellants Richard Lewis
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VIA ELECTRONIC TRANSMISSION

Ms. Jasmine D. Smith, Deputy Clerk
South Carolina Court of Appeals
ctappfilings@sccourts.org

RE: *Richard Lewis and Walter Lewis v. Robert M. Errato*
Appellate Case No.: 2025-002050

Ms. Smith,

Thank you for your correspondence dated August 10, 2026. We understand this was a notice of an overdue reply brief on Richard Lewis' appeal of denial of an injunction and constructive trust. We do not plan to file a reply on that matter.

Additionally, for clarity, our records indicate that all initial briefs have been filed. Here is our chronology of the filings:

On October 7, 2025, Mr. Errato filed his initial Notice of Appeal, submitted his Initial Brief on January 12, 2026, then an amended Initial Brief on April 29, 2026. We filed our Responsive Brief on May 29, 2026. We believe he has yet to file his Final Record on Appeal and Final Brief on his appeal. ***Please let us know how we should proceed on this issue.***

Lewis filed our Notice of Appeal on December 2, 2025. The two appeals were consolidated on January 21, 2026. We then submitted our Initial Brief on June 17, 2026, pursuant to a granted extension. Due to the lack of a scheduling order in this matter since the consolidation and your correspondence dated August 10, 2026, we respectfully request an extension until September 9, 2026, to file our final Record on Appeal and Final Brief. ***If an extension is not necessary, please advise what date Lewis' Final Brief and Record on Appeal is due.***

We apologize if we are mistaken and will happily fix whatever needs to be completed; however, at this time we believe, only our Final Record on Appeal and Final Brief are outstanding.

Thank you for your kind assistance in this matter.

Commented [J1]: Is this the correct person? I thought the letter came from someone else.

Commented [C1R2]: Heidi is the ctapp filing coordinator. The letter was from Jasmine Smith.



Jason M. Imhoff
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Yours Truly,

A stylized, handwritten signature in black ink, consisting of several overlapping loops and curves, representing the name Jason M. Imhoff.

Jason M. Imhoff

cc: Robert M. Errato (via email)