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STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

JUN 30 2022

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas  
The Honorable H. Steven DeBerry, IV, Circuit Court Judge  
Case No.: 2020-CP-22-00991

**SC Court of Appeals**

Case No.: 2022-000058

Michael Mares and Emergency Power, LLC.....Plaintiffs /Appellants,

v.

Bradley Douglas Marx (deceased) and Catherine Marx, Individually and in her capacity as  
Person Representative of the Estate of Bradley Douglas  
Marx.....Defendants / Respondent.

RESPONDENT’S MOTION TO EXTEND TIME TO FILE REPLY BRIEF

AND NOW, come Defendants–Respondents, Bradley Douglas Marx (deceased) and  
Catherine Marx, Individually and in her capacity as Person Representative of the Estate of  
Bradley Douglas Marx by and through their undersigned counsel, and in support of the Motion to  
Extend Time to filed Reply Brief for Respondents, aver as follows:

1. Respondent’s brief is currently due on July 5, 2022.
2. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Defendant’s /Respondent’s reply brief.
3. This Motion is made in good faith, and is not sought for purposes of delay but so that justice may be served.

Accordingly, pursuant to Rule 263(b), Appellants request that the Court grant an Additional thirty (30) days within which to file their reply brief.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

By: s/ Melody J.E. Breeden  
Audra M. Byrd, Esquire (S.C. Bar #76719)  
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Telephone: (843) 213-5500  
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*ATTORNEYS FOR DEFENDANT CATHERINE  
MARX, AS PERSONAL REPRESENTATIVE OF  
THE ESTATE OF BRADLEY DOUGLAS MARX  
(INCORRECTLY IDENTIFIED AS "BRADLEY  
DOUGLAS MARX (DECEASED)") AND  
CATHERINE MARX, INDIVIDUALLY*

Dated: June 30, 2022

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Person Representative of the Estate of Bradley Douglas  
Marx.....Defendants / Respondent.

PROOF OF SERVICE

I do hereby certify that on the 30th day of May, 2022, I served a copy of the within  
Defendants / Respondents Motion to Extend Time to File Reply Brief on all counsel of record  
via First Class Mail, postage pre-paid and addressed as follows:

Reese R. Boyd, III  
Davis & Boyd, LLC  
Post Office Box 70517  
Myrtle Beach, SC 39572  
[reese@davisboydlaw.com](mailto:reese@davisboydlaw.com)

*Attorneys for Appellants / Plaintiffs*

(Signature on following page)

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

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DOUGLAS MARX (DECEASED)") AND  
CATHERINE MARX, INDIVIDUALLY*

Dated: June 30, 2022

# Turner Padget

REPLY TO:

**Melody J.E. Breeden**

E-Mail: [mbreeden@turnerpadget.com](mailto:mbreeden@turnerpadget.com)  
Writer's Direct Dial: 843-213-5530  
Writer's Direct Fax: 843-213-5633

June 30, 2022

**RECEIVED**  
JUN 30 2022  
SC Court of Appeals

Via Email and Hand Delivery

SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Michael Mares and Emergency Power, LLC v Bradley Douglas Marx (deceased) and Catherine Marx, individually and as Personal Representative of the Estate of Bradley Douglas Marx  
Appellate Case No.: 2022-000058  
TP File No.: 16868.00101

Dear Sir/ Madam:

Enclosed please find (1) original Defendants/Respondents Motion for Extension of Time to file Reply Brief and (1) copy of Defendants/Respondents Motion for Extension of Time to file Reply Brief. Please file the original and return the clocked copy to my office in the envelope provided.

With kind regards,

Sincerely,

Turner Padget Graham & Laney, P.A.

*s/ Melody J. E. Breeden*

Melody J.E. Breeden

MJEB: cp  
Enclosures  
Cc: Reese Boyd, III

**Turner Padget**  
P.O. Box 1473, Columbia, SC 29202

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**VIA HAND DELIVERY**  
The Honorable Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
JUN 8 0 2022  
SC Court of Appeals