

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Georgetown County  
Court of Common Pleas  
H. Steven DeBerry, IV, Circuit Court Judge  
Case No.: 2020-CP-22-00991

---

Case No. 2022-000058

---

**RECEIVED**

**Aug 12 2022**

**SC Court of Appeals**

Michael Mares and Emergency Power, LLC,

Plaintiffs/Appellants,

*vs.*

Bradley Douglas Marx (deceased) and Catherine Marx, Individually and  
in her capacity as Personal Representative of the Estate of Bradley  
Douglas Marx,

Defendants.

---

MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF  
FOR PLAINTIFF-APPELLANT

---

AND NOW, come Plaintiffs-Appellants, Michael Mares and Emergency Power,  
LLC, by and through their undersigned counsel, and in support of this Motion for  
Extension of Time to File Reply Brief for Appellants, aver as follows:

1. The Initial Brief of Respondents was filed with the Court on August 4, 2022. Appellants' Reply Brief is therefore due on or before August 14, 2022.

2. Due to pre-existing staff vacation schedules and ongoing family health issues it will be difficult for Appellants' counsel to file the Reply Brief prior to the August 14, 2022 deadline.

3. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Appellants' Reply brief.

4. There will be no prejudice to Respondents in granting this extension of time to file the Reply Brief, and Appellants do not believe that any additional extension will be necessary or requested.

5. 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,

s/ Reese R. Boyd, III  
Reese R. Boyd, III, Esq. (SC Bar# 7151)  
**Davis & Boyd LLC**  
Post Office Box 70517  
Myrtle Beach, SC 29572  
(843) 839-9800  
(843) 839-9801 (fax)  
[reese@davisboydlaw.com](mailto:reese@davisboydlaw.com)

*Attorneys for the Appellants,  
Michael Mares and Emergency Power, LLC*

Dated: August 12, 2022  
Myrtle Beach, South Carolina

**RECEIVED**

**Aug 12 2022**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Georgetown County  
Court of Common Pleas  
H. Steven DeBerry, IV, Circuit Court Judge  
Case No.: 2020-CP-22-00991

---

Case No. 2022-000058

---

Michael Mares and Emergency Power, LLC,

Plaintiffs/Appellants,

*vs.*

Bradley Douglas Marx (deceased) and Catherine Marx, Individually and  
in her capacity as Personal Representative of the Estate of Bradley  
Douglas Marx,

Defendants.

---

PROOF OF SERVICE

---

I certify that on this date a copy of the foregoing **APPELLANTS' MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF** was served on each party or counsel of record by mailing or hand delivery in the manner prescribed by the applicable Rule of Civil Procedure as follows:

Melody J. E. Breeden, Esq.  
Audra M. Byrd, Esq.  
Turner, Padget, Graham & Laney, PA  
2411 N. Oak Street, Suite 301  
Myrtle Beach, SC 29577  
(843) 213-5500  
(843) 213-5555 (fax)  
[abyrd@turnerpadget.com](mailto:abyrd@turnerpadget.com)  
[MBreeden@TurnerPadget.com](mailto:MBreeden@TurnerPadget.com)  
*Attorneys for Respondents*

s/ Reese R Boyd, III  
Reese R. Boyd, III, Esq. (SC Bar #: 7151)  
**Davis & Boyd, LLC**  
Post Office Box 70517  
Myrtle Beach, SC 29572  
(843) 839-9800  
(843) 839-9801 (fax)  
reese@davisboydlaw.com

*Attorney for Plaintiff-Appellants*

Dated: August 12, 2022  
Myrtle Beach, South Carolina