

RECEIVED

Oct 10 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable William H. Seals, Jr.

Appellate Case No. 2023-001142

Circuit Court Case No. 2022-CP-26-07708

Epic-NRG, LLC..... Respondent,

v.

Nicholas James Ragle, Chaps Development, LLC, and
Ragle Sustainable Technology Sales Agency, LLC..... Appellants,

APPELLANTS' MOTION TO EXTEND TIME

(signature page to follow)

THE DODD LAW FIRM, LLC

By: /s/ Michael B. Dodd
SC Bar No.: 100599
The Dodd Law Firm, LLC
13 Sevier Street
Greenville, SC 29605
864-747-5607
michael@thedoddlawfirm.com

Attorney for the Appellants

October 10, 2023

TABLE OF AUTHORITIES

RULES

Rule 207 SCACR.....	1
Rule 208 SCACR.....	1
Rule 263 SCACR.....	1

The Appellants, Nicholas James Ragle, Chaps Development, LLC, and Ragle Sustainable Technology Sales Agency, LLC., through their undersigned counsel, hereby file this motion to extend the time to to file the Appellants' initial brief pursuant to Rule 263, 207 and 208 of the South Carolina Appellate Court Rules ("SCACR"). Appellants filed their notice of appeal on July 14, 2023. Thereafter, Appellants have been working to obtain the necessary funds to finance the appeal and related costs. Additionally, there is now pending, a motion to grant Appellant relief from the judgment in the underlying case in North Carolina and the judgment that gave rise to the Common Pleas case in South Carolina. The case is numbered, FILE NO 22-CVS-1510, and is awaiting a hearing in Superior Court in Buncombe County, North Carolina. Plaintiff/Respondent Epic-NRG, LLC filed a motion for continuance just prior to the originally scheduled hearing in this matter, which would have been instructive in the current appellate case in South Carolina. Due to these circumstances, the Appellants request an extension of time of forty-five (45) days to file the initial brief in this matter.

Appellants hereby request that the court extend the time for the time to file Appellants' initial brief to be at least forty-five (45) days from the date of this motion.

Respectfully submitted,

(signature page to follow)

By: /s/ Michael B. Dodd
SC Bar No.: 100599
The Dodd Law Firm, LLC
13 Sevier Street
Greenville, SC 29605
864-214-5012
michael@thedoddlawfirm.com

Attorney for the Appellants

October 10, 2023

RECEIVED

Oct 10 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable William H. Seals, Jr.

Appellate Case No. 2023-001142

Circuit Court Case No. 2022-CP-26-07708

Epic-NRG, LLC..... Respondent,

v.

Nicholas James Ragle, Chaps Development, LLC, and
Ragle Sustainable Technology Sales Agency, LLC..... Appellants,

CERTIFICATE OF SERVICE

I, the undersigned attorney for the Appellants., do hereby certify that I have served the below parties in this action with a copy of the Appellant's Motion to Extend Time, by emailing a copy of the same to the following address and also by United States Mail:

PARTIES SERVED:

Paul H. Hofer
SC Bar #77506
Robinson Gray Stepp & Laffitte, LLC
P.O. Box 11449
Columbia, SC 29211
(803) 929-1400
Email: phofer@robinsongray.com

Attorney for the Respondent

By: /s/ Michael B. Dodd
SC Bar No.: 100599
The Dodd Law Firm, LLC
13 Sevier Street
Greenville, SC 29605
864-214-5012
michael@thedoddlawfirm.com

Attorney for the Appellants

October 10, 2023