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Nov 01 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
COURT OF COMMON PLEAS

Judge Lawton McIntosh

Case No. 2020-CP-23-03949

Brian W. Bowles and Kristina
Bowles,

Appellants,

v.

Nery Rodas d/b/a RNG
Contracting, LLC.

Respondent.

**MOTION FOR EXTENSION OF TIME TO FILE
APPELLANT'S INITIAL REPLY BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rule 240, SCACR, Appellants Brian W. Bowles and Kristina Bowles hereby request that the Court grant an extension in which to file his Initial Brief and Designation of Matter in the above-captioned matter. The transcript in this matter was received on October 4, 2023 and pursuant to Rule 263, SCACR, Appellant's Initial Brief is due Monday, November 6, 2023. Counsel for Appellants believes that the requested extension will neither prejudice the parties nor unduly delay this appeal. Counsel for Appellant is making this request because in the past month and throughout the course of this and the past month, counsel for Appellant has been ill and otherwise engaged in mediations and motion hearings.

Respectfully submitted,

/s/Ra'na Heidari

A BUSINESS LAW FIRM, LLC.

Ra'na Heidari, Esq. (SC Bar No. 104501)

rxh@abizlaw.com

Chelsea R. Rikard, Esq. (SC Bar No. 102355)

crr@abizlaw.com

Attorneys for Appellant

1989 South Pine Street

Spartanburg, SC 29302

(864) 699-9801

November 1, 2023

Spartanburg, South Carolina

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Bowles,

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v.

Nery Rodas d/b/a RNG
Contracting, LLC.

Respondent.

PROOF OF SERVICE

I certify that I have served the foregoing Motion for Extension of Time on the above-named Respondent by e-mail on November 1, 2023, addressed to counsel of record as follows.

Charles G. Blackburn, Esq.
cblackburn@goodwynlaw.com

Respectfully submitted,

/s/Jill Hendley

Paralegal

A BUSINESS LAW FIRM, LLC.

Ra'na Heidari, Esq. (SC Bar No. 104501)

rxh@abizlaw.com

Chelsea R. Rikard, Esq. (SC Bar No. 102355)

crr@abizlaw.com

Attorneys for Appellant

1989 South Pine Street

Spartanburg, SC 29302

(864) 699-9801

November 1, 2023
Spartanburg, South Carolina

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Judge Lawton McIntosh

Case No. 2020-CP-23-03949
Appellate Case No. 2023-001227

Nery Rodas d/b/a RNG
Contracting, LLC.

Respondent,

v.

Brian W. Bowles and
Kristina Bowles

Appellants.

PROOF OF SERVICE

I certify that I have served the Appellant's Motion for Extension of Time to File Appellant's Initial Reply Brief and Designation of Matter to Nery Rodas d/b/a RNG Contracting, LLC by electronic mail and by depositing a copy of it in the United States Mail, postage prepaid, on November 1, 2023. Addressed to their attorney of record, Charles Blackburn of Goodwyn Law Firm, at cblackburn@goodwynlaw.com and 2309 Devine Street Columbia, SC 29205.

November 1, 2023

s/ Ra'na Heidari
A Business Law Firm, LLC.
Ra'na Heidari, Esq. SC Bar #104501
rxh@abizlaw.com
Chelsea Rikard, Esq. SC Bar #102355
crr@abizlaw.com
1989 S. Pine St.
Spartanburg, SC 29302
Attorneys for Appellant



1989 S. PINE ST.
SPARTANBURG, SC 29302
(864) 699-9801

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Nov 01 2023

SC Court of Appeals

November 1, 2023

Via USPS Certified Mail

South Carolina Court of Appeals

Attn: The Honorable Jenny Abbott Kitchens, Clerk of Court
Post Office Box 11629
Columbia, SC 29211

RE: Nery Rodas d/b/a RNG Contracting, LLC. v. Brian W. Bowles and Kristina Bowles
Case No. 2020-CP-23-03949
Appellate Case No. 2023-001227

Dear Ms. Kitchens,

Enclosed for filing, please find the following in connection with the above-referenced matter:

1. Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of Matter;
2. Appellant's Proof of Service; and
3. A filing fee in the amount of \$50.00.

Please feel free to reach out if you have any questions.

Respectfully,

Ra'na Heidari, Esq.
A Business Law Firm, LLC.
1989 S. Pine St.
Spartanburg, SC 29302
(864) 699-9801
rxh@abizlaw.com

CC: Charles G. Blackburn
2309 Devine Street
Columbia, SC 29205
cblackburn@goodwynlaw.com
Attorney for Respondent

Enclosed/
Motion
Proof of Service
Fee

Chelsea Rikard, Esq.
crr@abizlaw.com

Lauren Ward, Esq.
lew@abizlaw.com

Ra'na Heidari, Esq.
rxh@abizlaw.com

Front Office
ofc@abizlaw.com