

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

100927

APPEAL FROM GREENVILLE COUNTY
CIRCUIT COURT

RECEIVED

R. Lawton McIntosh, Circuit Court Judge

FEB 01 2024

SC Court of Appeals

Appellate Case No. 2023-001227

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

v.

Brian W. Bowles and Kristina Bowles,.....Appellants.

**MOTION FOR EXTENSION TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER**

Respondent, by and through his undersigned attorney hereby moves this Honorable Court for a 60-day extension in which to file his Initial Brief and Designation of Matter to be included in the Record on Appeal. Appellants filed their Notice of Appeal on July 31, 2023. Respondent has been attempting to obtain copies of the transcripts from the multiple hearings from WebEx and the Court Reporters to prepare Respondent’s Initial Brief and has not been successful.

Respondent’s counsel has been able to obtain two of the four transcripts necessary to prepare Respondent’s Initial Brief but is having difficulty obtaining the last two transcripts necessary to prepare Respondent’s Initial Brief and Designation of Matter on Appeal.

Respondent hereby requests a 60-day extension to file their initial brief due to the Court Reporter needing a few weeks to produce the transcript. If the extension is granted, the Initial Brief of Appellant will be due on March 20, 2023 (March 19, 2023 is on a Sunday).



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Attorneys for Respondent

Columbia, South Carolina
February 1, 2024

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Appellant Case No. 2023-001227

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v.

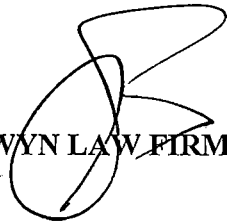
Brian W. Bowles and Kristina Bowles.....Appellants.

PROOF OF SERVICE

I certify that I have served a copy of the Respondent’s Motion for Extension to File Initial Brief and Designation of Matter including the proof of service upon the Appellants’ attorneys via e-mail sent to their email address of record, namely rxh@abizlaw.com and crr@abizlaw.com as well as via regular mail on February 1, 2024.

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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

February 1, 2024

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SC Court of Appeals

VIA HAND DELIVERY

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

RE: ***Brian W. Bowles and Kristina Bowles vl Nery Rodas d/b/a RNG Contracting, LLC***
Appellate Case No.: 2023-001227
Our File No.: 3000-0712

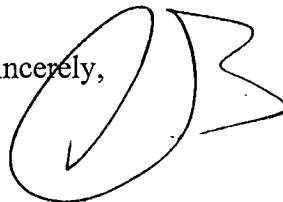
Dear Ms. Kitchings:

Enclosed for filing, please find the original and one copy of Respondent's Motion for Extension to File Initial Brief and Designation of Matter and Proof of Service in regards to the above referenced matter. Please file the original and return a filed copy of same to me in the self-addressed stamped envelope provided. Also, enclosed is a check in the amount of \$50.00 representing the filing fees.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this Motion.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



Charles G. Blackburn

CGB

Enclosures

cc: Ra'na Heidari, Esquire (e-mail-rxh@abizlaw.com & Regular Mail)
Chelsea R. Rickard, Esquire (e-mail-crr@abizlaw.com & Regular Mail)
Nery Rodas