

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable R. Lawton McIntosh, Circuit Court Judge

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

Nery Rodas d/b/a RNG Contracting, LLCRespondent,

v.

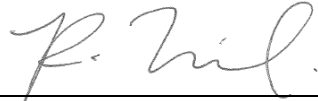
Brian W. Bowles and Kristina BowlesAppellants.

**APPELLANTS BRIAN W. BOWLES AND KRISTINA BOWLES’S MOTION
REQUESTING ADDITIONAL TIME TO FILE REPLY BRIEF**

Appellants, Brian W. Bowles and Kristina Bowles, hereby request that the Court grant a 10-day extension for Appellants to serve and file their Reply Brief, which is currently due on April 12, 2024. Counsel for Appellants believes that the extension will neither prejudice the parties nor unduly delay this appeal. Counsel for the Appellants are making this request due to attorney of record changing firms, which leave Appellants requiring additional time to finalize the pleadings. If this request is granted, the new deadline would be April 22, 2024. Appellants have not received a prior extension.

No memorandum in support of this motion is being filed as it is counsel’s belief that such memorandum would not aid the court in ruling on the motion.

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



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Attorneys for Appellants

Greenville, South Carolina
April 11, 2024

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Apr 11 2024

SC Court of Appeals

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v.

Brian W. Bowles and Kristina BowlesAppellants.

PROOF OF SERVICE

I, the undersigned attorney for the Appellants, Brian W. Bowles and Kristina Bowles, do hereby certify that I have served a copy of the Appellants’ Motion Requesting Additional Time to File Reply Brief, by depositing a copy of it in the United States Mail, postage prepaid, on April 11, 2024, addressed to their attorneys of record, Charles G. Blackburn, Goodwyn Law Firm, LLC, 2309 Devine Street, Columbia, SC 29205, and by electronic mail at: cblackburn@goodwynlaw.com. I also certify that I have served a copy of the Appellants’ Motion Requesting Additional Time to File Reply Brief by depositing it in the United States Mail, postage prepaid, on April 11, 2024, addressed to The Honorable Jenny Abbott Kitchings, Clerk of Court, P.O. Box 11629, Columbia, SC 29211, and by electronic mail at: ctappfilings@sccourts.org.

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Attorneys for Appellants

Greenville, South Carolina
April 11, 2024

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Via US Mail and Email

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
Clerk of Court
PO Box 11629
Columbia, SC 29211

RE: Nery Rodas d/b/a RNG Contracting, LLC v. Brian W. Bowles and Kristina Bowles
Circuit Case No: 2020-CP-23-03949
Appellant Case No: 2023-00127

Dear Ms. Kitchings:

Please find enclosed herewith one copy of Appellants Brian W. Bowles and Kristina Bowles's Motion Requesting Motion for Extension, along with a Proof of Service for the same. Also enclosed is our filing fee in the amount of \$50.00.

Should you have any questions, please do not hesitate to contact us.

Very truly yours,

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



Sarah Kellner
Paralegal

/skk

Enclosures

cc: Charles G. Blackburn, Esq. (cblackburn@goodwynlaw.com)
T. Jeff Goodwyn, Jr., Esq. (jgoodwyn@goodwynlaw.com)