

RECEIVED

May 29 2024

SC Court of Appeals

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.

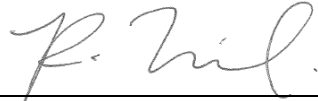
Brian W. Bowles and Kristina BowlesAppellants.

**APPELLANTS BRIAN W. BOWLES AND KRISTINA BOWLES’S MOTION
REQUESTING ADDITIONAL TIME TO FILE RECORD ON APPEAL**

Appellants, Brian W. Bowles and Kristina Bowles, hereby request that the Court grant a 30-day extension for Appellants to serve and file their Record on Appeal, which is currently due on May 29, 2024. Counsel for Appellants believes that the extension will neither prejudice the parties nor unduly delay this appeal. Counsel for the Appellants is making this request due to needing additional time to acquire documents, to be included in the Record on Appeal, that are in other parties’ possessions. If this request is granted, the new deadline would be June 28, 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



Ra'na Heidari, Esquire (S.C. Bar #104501)

Holder Padgett Littlejohn + Prickett, LLC

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Attorneys for Appellants

Greenville, South Carolina

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

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 Record on Appeal, by depositing a copy of it in the United States Mail, postage prepaid, on May 29, 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 Record on Appeal by depositing it in the United States Mail, postage prepaid, on May 29, 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.

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



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May 29, 2024

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May 29, 2024

Via US Mail and Email

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

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SC Court of Appeals

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 Additional Time to File Record on Appeal, 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)

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