

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Nov 03 2025

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Williams H. Seals, Jr., Circuit Court Judge

Case No: 2022-CP-40-02958

Appellate Case No: 2025-001409

Michael D. Jordan, Apple Services, Inc. and Plumbinator 1051, LLC Respondents,

v.

Liquid Services and Logistics, LLC and Tim Freeman Defendants,

Of whom Liquid Services and Logistics, LLC is Appellant.

**RESPONDENTS' MOTION FOR ADDITIONAL TIME
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

Pursuant to Rules 224 and 263(b), SCACR, Respondents Michael D. Jordan, Apple Services, Inc. and Plumbinator 1051, LLC move this Court for an additional thirty (30) days to file Respondents' Initial Brief and Designation of Matter. Pursuant to the Court's Order dated October 8, 2025, Respondents' deadline to file its Initial Brief and Designation of Matter is November 6, 2025; and with the additional 30-day extension, the deadline for filing Respondents' Initial Brief and Designation of Matter will be extended to December 8, 2025.

This Motion is based upon Respondents' counsel's recent trial schedule and commitments in other matters. This request is the second extension requested by Respondents for filing its Initial Brief and Designation of Matter. Allowing the extension of time will not prejudice the Appellant

and Appellant's counsel has consented to Respondents' motion for extension of time to file Respondents' Initial Brief.

Respectfully submitted.

/s/James Y. Becker

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Attorneys for Respondents

November 3, 2025

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v.

Liquid Services and Logistics, LLC and Tim Freeman Defendants,

Of whom Liquid Services and Logistics, LLC is Appellant.

PROOF OF SERVICE

I certify that on November 3, 2025, **Respondents' Motion for Additional Time to File Initial Brief and Designation of Matter** was served via electronic mail only upon attorneys for Appellant: Beth B. Richardson at brichardson@robinsongray.com and Cordes B. Kenndy at ckennedy@robinsongray.com.

/s/James Y. Becker

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November 3, 2025

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Via email: ctappfilings@sccourts.org
The Honorable Jenny Abbott Kitchings
Clerk of Court, The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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RE: *Michael D. Jordan, et al v. Liquid Services and Logistics, LLC, et al*
Circuit Court Case No. 2022-CP-40-02958
Appellate Case No: 2025-001409
HSB File No. 45433.0001

Dear Ms. Kitchings:

Enclosed for filing in connection with the referenced matter is Respondents' Motion for Additional Time to File Initial Brief and Designation of Matter, along with a Proof of Service. Our firm's check in the amount of \$50.00 will be delivered to the above street address. We would appreciate your presenting the motion to the Court for its consideration and returning a filed copy to us.

Please contact us if you have any questions concerning the enclosures.

Thank you for your assistance in this matter.

Sincerely,



James Y. Becker

JYB/hh

Enclosures

cc(w/encl.): Cordes B. Kennedy via email: ckennedy@robinsongray.com
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