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Dec 05 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the 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**

Respondents’ Initial Brief and Designation of Matter is due on December 8, 2025. Due to the December and New Year’s holiday schedule and the workload of counsel in other pressing matters, Respondents respectfully request a second extension of time of fourteen (14) days in which to file its Initial Brief and Designation of Matter, which would result in a new deadline of December 22, 2025. Appellant’s counsel consents to this request and for the same reasons ask that Appellant’s deadline to file its Initial Reply Brief be extended to January 16, 2026.

[signature page to follow]

Respectfully submitted.

/s/James Y. Becker

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Attorneys for Respondents

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Of whom Liquid Services and Logistics, LLC is Appellant.

PROOF OF SERVICE

I certify that on December 5, 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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December 5, 2025

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December 5, 2025

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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SC Court of Appeals

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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