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Mar 30 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY

Daniel Coble, Circuit Court Judge

Case No. 2024-CP-40-06968

Linda Plaag and Robert Plaag,.....Respondents,

v.

Charles Oliver, Leanna Oliver, Davis Oliver, Devin Patel, Foundations Investment Advisors, LLC, Strategic Equity Energy a Series of V360 Holdings LLC, Strategic Equity Path, LP, Strategic Equity Path, GP, Strategic Equity Technology a Series of V360 Holdings LLC, Strategic Equity Technology LLC, Strategic Equity Technology Management LLC, Hidden Wealth Management LLC, Alternative Wealth Solutions, LLC, The Institute of Financial Enrichment, LLC, Strategic Retirement Solutions, LLC, American Equity Investment Advisors, LLC, Innovative Medical Enterprises, LLC, CDO Enterprises, Inc., Event Labels LLC, Oliver Heritage, LLC, KTF, LLC, Strategic Equity Partners, LLC, Moving Future, LLC, Incredible Concepts, LLC, Upside Solutions, LLC, Oliver Avery and Bryant LLC, ERP LLC, GITW, LLC, Legacy of Faith LP, Legacy of Faith Trust, and John Doe Corporate Entities,.....Defendants,

Of which Charles Oliver, Leanna Oliver, Davis Oliver, Strategic Equity Energy a Series of V360 Holdings LLC, Strategic Equity Path, LP, Strategic Equity Path, GP, Strategic Equity Technology a Series of V360 Holdings LLC, Strategic Equity Technology LLC, Strategic Equity Technology Management LLC, Hidden Wealth Management LLC, Alternative Wealth Solutions, LLC, The Institute of Financial Enrichment, LLC, Strategic Retirement Solutions, LLC, American Equity Investment Advisors, LLC, Innovative Medical Enterprises, LLC, CDO Enterprises, Inc., Event Labels LLC, Oliver Heritage, LLC, KTF, LLC, Strategic Equity Partners, LLC, Moving Future, LLC, Incredible Concepts, LLC, Upside Solutions, LLC, Oliver Avery and Bryant LLC, ERP LLC, GITW, LLC, Legacy of Faith LP, and Legacy of Faith Trust are,..... Appellants.

RESPONDENTS' MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), SCACR, Respondents Linda and Robert Plaag move this Court for an extension of time for Respondents to file their Initial Brief and Designation of the Record in this matter.

In support of this motion, Respondents state as follows:

1. Appellants filed their notice of appeal in this matter on August 18, 2025. Appellant's Initial Brief and Designation of the Record was initially due December 19, 2025.

2. On December 11, 2025, Appellants received a 30-day extension of time to serve their Initial Briefs and Designation of the Record. which was followed by a second, eight-day extension granted on January 12, 2026. On January 27, 2026, Appellants timely filed their Initial Brief and Designation of the Record.

3. On February 30, 2026, Respondents moved for a 30-day extension to file and serve their Initial Brief and Designation of the Record. The Court granted that request on February 25, 2026.

4. Respondents' Initial Brief and Designation of the Record currently are due March 30, 2026.

5. Respondents now move for an additional seven-day extension of time to file their Initial Brief and Designation of the Record to April 6, 2026.

6. Good cause exists for this request because emergency matters arose last week which prevented counsel from finalizing the brief in this matter. A modest seven-day extension to complete the Initial Brief and Designation of the Record will afford counsel the opportunity to fully address the matters raised in this appeal.

7. This request is made in good faith and not for purposes of delay. Appellants will not be prejudiced by this extension.

8. Respondents have conferred with Appellants regarding this extension, and all parties consent.

Respondents Linda and Robert Plaa therefore request that the Court grant this motion and extend the time for filing Appellants' Initial Briefs and Designation of the Record until April 6, 2026.

Respectfully submitted,

WILLOUGHBY HUMPHREY & D'ANTONI, P.A.

s/ R. Walker Humphrey, II

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Attorneys for Respondents

March 30, 2026

Charleston, South Carolina

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Of which Charles Oliver, Leanna Oliver, Davis Oliver, Strategic Equity Energy a Series of V360 Holdings LLC, Strategic Equity Path, LP, Strategic Equity Path, GP, Strategic Equity Technology a Series of V360 Holdings LLC, Strategic Equity Technology LLC, Strategic Equity Technology Management LLC, Hidden Wealth Management LLC, Alternative Wealth Solutions, LLC, The Institute of Financial Enrichment, LLC, Strategic Retirement Solutions, LLC, American Equity Investment Advisors, LLC, Innovative Medical Enterprises, LLC, CDO Enterprises, Inc., Event Labels LLC, Oliver Heritage, LLC, KTF, LLC, Strategic Equity Partners, LLC, Moving Future, LLC, Incredible Concepts, LLC, Upside Solutions, LLC, Oliver Avery and Bryant LLC, ERP LLC, GITW, LLC, Legacy of Faith LP, and Legacy of Faith Trust are,..... Appellants.

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2026, in compliance with Rule 203 (d)(1), SCACR, I served the Respondents' Motion for Extension of Time by electronic mail on the counsel below at their email address on file with the Attorney Information System. I further certify that all parties required to have been served have been served.

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/s/ R. Walker Humphrey, II

R. Walker Humphrey, II

March 30, 2026
Charleston, South Carolina



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March 30, 2026

VIA ELECTRONIC FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
P.O. Box 11629
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RECEIVED
Mar 30 2026
SC Court of Appeals

Re: *Linda Plaag and Robert Plaag v. Charles Oliver, et al.*
Appellate Case No. 2025-001658

Dear Ms. Kitchings:

Attached for electronic filing please find Respondents' Motion for Extension of Time in the above-referenced matter.

By copy of this letter, we are serving counsel of record via electronic mail and enclose a Certificate of Service to that effect. The filing fee for the motion will be hand delivered to your office. If you have any questions or need any additional information, please do not hesitate to contact me.

With kindest regards, I am

Sincerely yours,

WILLOUGHBY HUMPHREY & D'ANTONI, P.A.

R. Walker Humphrey, II

RWH/kmd

Cc: All Counsel of Record (by email)