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Jun 08 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Vernon F. Dunbar, Circuit Court Judge

Case No. 2025-CP-23-04210
Appellate Case No. 2026-000858

FRANK GEORGE ROGERS, individually and derivatively
as a member and on behalf of Exodus Aircraft, LLC,

Respondent,

v.

JOSHUA BRETT KIMBRELL, LILIYA SCHCERBA
ROBERTSON KIMBRELL, EXODUS AIRWAYS, LLC, THOMAS
BLAKE WHITAKER, Defendants,

of which JOSHUA BRETT KIMBRELL and LILIYA SCHCERBA
ROBERTSON KIMBRELL are the

Appellants.

**MOTION FOR EXTENSION OF TIME
TO FILE INITIAL BRIEF AND RECORD ON APPEAL**

The undersigned counsel, on behalf of Appellants Joshua Kimbrell and Liliya Kimbrell, respectfully requests the Court extend the time to file the opening brief until July 8, 2026.¹ This request is based on counsel's current case load and other pending deadlines and is not intended to delay the matter. Additionally, counsel has consulted with opposing counsel Hannah Metcalfe who does not object to the request for an extension.

Respectfully Submitted,

¹ Counsel calendared the deadline in this matter for June 6, 2026, but after reviewing the prior correspondence the deadline may have been June 4, 2026. To the extent this motion is filed past the deadline, counsel respectfully requests the Court consider the motion out of time and excuse the late filing.

s/ Joshua Snow Kendrick

Joshua Snow Kendrick (SC ID 70453)

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CERTIFICATE OF SERVICE

The undersigned counsel certifies he has served a copy of this notice by electronic mail on opposing counsel at the following e-mail addresses this 8th day of June, 2026. All parties are informed that counsel will mail a hard copy if requested:

Hannah Rogers Metcalfe, Esquire
HMetcalfe@MALawFirmSC.com

Respectfully Submitted,

s/ Joshua Snow Kendrick

Joshua Snow Kendrick (SC ID 70453)
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