

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

RECEIVED

Jul 06 2026

SC Court of Appeals

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 August 7, 2026.

The current deadline is July 8, 2026. Because of the Fourth of July holiday, travel with family, and other deadlines, counsel was unable to complete the initial brief in this matter.

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,

s/ Joshua Snow Kendrick

Joshua Snow Kendrick (SC ID 70453)
KENDRICK & LEONARD, P.C.
7 Mills Avenue (29605)
P.O. Box 6938
Greenville, SC 29606
Tel: (864) 760-4000
Josh@KendrickLeonard.com

July 6, 2026
Greenville, South Carolina

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ROBERTSON KIMBRELL are the

Appellants.

CERTIFICATE OF SERVICE

The undersigned counsel certifies he has served a copy of this Request for Extension by electronic mail on opposing counsel at the following e-mail addresses this 6th day of July, 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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7 Mills Avenue (29605)
P.O. Box 6938
Greenville, SC 29606
Tel: (864) 760-4000

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