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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In The Supreme Court of South Carolina

APPEAL FROM THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

APPELLATE CASE NO. 2026-001436

Public Service Commission of South Carolina;

Dominion Energy South Carolina, Inc.....Respondent

v.

Thomas M. Ragon Jr.....Appellant

MOTION FOR STAY OF BRIEFING SCHEDULE

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Appellant Thomas Ragon, appearing *pro se*, respectfully moves this Court pursuant to Rule 240, SCACR, for a brief Stay of the Briefing Schedule in the instant matter. In support of this request, Appellant states as follows:

1. **Purpose of the Stay:** Appellant seeks a brief stay of the Rule 208 briefing timeline to prepare and file a comprehensive Motion for Consolidation and accompanying Memorandum of Law addressing all interrelated dockets currently before or nearing ripeness before this Court.
2. **Complexity and Scope:** This appeal is inextricably linked to another matter currently pending before this Court, as well as three additional closely related regulatory proceedings currently nearing appellate ripeness. All five dockets involve identical core questions of constitutional due process, South Carolina Administrative Procedures Act (SCAPA) record requirements, and systemic actions taken by the same administrative agency and public utility.

3. **Commitment to Absolute Transparency:** Appellant is preparing a detailed matrix for the forthcoming consolidation motion and Memorandum of Law. This matrix will identify the precise procedural posture of each related docket, provide a reliable estimate of appellate ripeness, and demonstrate the systemic legal impact of the interdependent records. Presenting this information in a single, unified filing ensures that the Court receives a complete and accurate depiction of the broader regulatory landscape rather than fragmented snapshots across multiple briefs.
4. **Intervening Regulatory Materiality:** A temporary stay is critical to ensure that recent, highly material regulatory developments, including a newly announced corporate acquisition directly impacting the underlying dockets, are properly briefed and integrated into the legal analysis rather than presented in a piecemeal fashion.
5. **No Prejudice:** A brief stay will not prejudice the Respondents. To the contrary, it prevents the unnecessary expenditure of resources on briefing that would be rendered incomplete by the imminent ripening of related dockets. The stay promotes efficiency for all parties and ensures that the Court receives a fully developed and unified record.

LAW AND LEGAL ARGUMENT

This Court possesses the absolute procedural authority to grant the requested relief. Pursuant to **Rule 263(b) of the South Carolina Appellate Court Rules (SCACR)**, this Court—for good cause shown—may upon motion enlarge the time prescribed by these rules or by its order for doing any act, or may permit an act to be done after the expiration of such time.

Complementing this authority, the Court maintains the inherent power under the appellate framework to suspend the requirements or provisions of its rules in a particular case on application of a party or on its own motion, ordering proceedings in accordance with its direction to achieve justice.

Here, Appellant has demonstrated both good cause and excusable neglect directly tied to the administrative timeline surrounding the July 9, 2026 perfection of this appeal. Furthermore, holding the SCACR 208 briefing timeline in temporary abeyance heavily favors judicial economy. Rather than forcing the parties and the Court into fragmented, piecemeal appellate litigation across multiple heavily overlapping dockets, a brief stay allows for a transparent, unified presentation of the interlocking records.

A brief stay ensures that the Court receives a complete, unified record rather than a prematurely briefed subset of issues.

WHEREFORE, Appellant respectfully requests that this Court issue an Order staying the briefing schedule in the instant docket for a period of forty-five (45) days to allow for the filing of a comprehensive Motion for Consolidation and Memorandum of Law.

Respectfully submitted,



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