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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Ninth Judicial Circuit

The Honorable Charles B. Simmons, Jr., Circuit Court Judge

Appellate Case No. 2026-000524

Timothy Jones as the Personal Representative for Dewitt Jones.....Appellant,

v.

Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder.....Respondents.

APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE HIS INITIAL REPLY BRIEF AND DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL

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APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE HIS INITIAL REPLY BRIEF AND DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL

AND NOW COMES Appellant Timothy Jones as the Personal Representative for Dewitt Jones ("Mr. Jones"), by and through his undersigned counsel, pursuant to Rule 263(b), SCACR, and moves for an extension of twenty (20) days additional time to file and serve his Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal.

1. Respondents Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder served and filed their Initial Brief of Respondents on September 11, 2026.

2. Appellant Mr. Jones' Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal is currently due on September 21, 2026.

3. Due to the complexity and volume of issues in this appeal, Appellant Mr. Jones is hereby requesting a twenty-day extension of time to file and serve his Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal.

4. Appellant Mr. Jones' counsel requests an extension of time until October 12, 2026 (the twentieth day falls on a Sunday) to file his Initial Reply Brief as Appellant and Designation of Matter for Inclusion in the Record on Appeal.

5. Appellant Mr. Jones believes that this relief is consistent with the interests of justice and will not work any undue prejudice upon any party.

6. Counsel for Respondents Innovative Scientific Solutions, LLC, J. Ryan Flanagan, Jay A. Flanagan, Jr., and Marion L. Snyder has consented to the relief requested herein.

WHEREFORE, for the foregoing reasons, Appellant Timothy Jones as the Personal Representative for Dewitt Jones moves this Honorable Court to grant him an extension of 20 days to file and serve his Initial Reply Brief and its Designation of Matter for Inclusion in the Record on Appeal related thereto. With the requested extension of time, the new deadline for filing and serving Appellant's Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal will be October 12, 2026. Additionally, Appellant Mr. Jones respectfully requests that the

Court hold its present deadline for the service and filing of its Initial Reply Brief and Designation of Matter for Inclusion in the Record on Appeal in abeyance until it acts upon this Motion.

BARNWELL WHALEY PATTERSON & HELMS, LLC

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PROOF OF SERVICE

I certify that I have served **APPELLANT'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE AND SERVE HIS INITIAL REPLY BRIEF AND DESIGNATION OF MATTER FOR INCLUSION IN THE RECORD ON APPEAL** on counsel for the above-referenced Respondents by email in accordance with the South Carolina Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022) on September 16, 2026, addressed to their attorneys of record:

Adam C. Bach, Esq.
Sarah K. Compton, Esq.
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