

STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAY 31 2022

SC Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas
The Honorable H. Steven DeBerry, IV, Circuit Court Judge
Case No.: 2020-CP-22-00991

Case No.: 2022-000058

Michael Mares and Emergency Power, LLC.....Plaintiffs /Appellants,

v.

Bradley Douglas Marx (deceased) and Catherine Marx, Individually and in her capacity as
Person Representative of the Estate of Bradley Douglas
Marx.....Defendants / Respondent.

RESPONDENT’S MOTION TO EXTEND TIME TO FILE REPLY BRIEF

AND NOW, come Defendants–Respondents, Bradley Douglas Marx (deceased) and Catherine Marx, Individually and in her capacity as Person Representative of the Estate of Bradley Douglas Marx by and through their undersigned counsel, and in support of the Motion to Extend Time to filed Reply Brief for Respondents, aver as follows:

1. Respondent’s brief is currently due on June 3, 2022.
2. Accordingly, it is respectfully requested that the Court grant an additional 30-day extension of time for the filing of Defendant’s /Respondent’s reply brief.
3. This Motion is made in good faith, and is not sought for purposes of delay but so that justice may be served.

Accordingly, pursuant to Rule 263(b), Appellants request that the Court grant an Additional thirty (30) days within which to file their reply brief.

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

By: s/ Melody J.E. Breeden
Audra M. Byrd, Esquire (S.C. Bar #76719)
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*ATTORNEYS FOR DEFENDANT CATHERINE
MARX, AS PERSONAL REPRESENTATIVE OF
THE ESTATE OF BRADLEY DOUGLAS MARX
(INCORRECTLY IDENTIFIED AS "BRADLEY
DOUGLAS MARX (DECEASED)") AND
CATHERINE MARX, INDIVIDUALLY*

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Marx.....Defendants / Respondent.

PROOF OF SERVICE

I do hereby certify that on the 26th day of May, 2022, I served a copy of the within
Defendants / Respondents Motion to Extend Time to File Reply Brief on all counsel of record
via First Class Mail, postage pre-paid and addressed as follows:

Reese R. Boyd, III
Davis & Boyd, LLC
Post Office Box 70517
Myrtle Beach, SC 39572
reese@davisboydlaw.com

Attorneys for Appellants / Plaintiffs

(Signature on following page)

Respectfully submitted,

TURNER PADGET GRAHAM & LANEY P.A.

By: s/ Melody J.E. Breeden

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Turner Padget

Melody J.E. Breeden

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May 26, 2022

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SC Court of Appeals

Via Email and US Mail

SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Michael Mares and Emergency Power, LLC v Bradley Douglas Marx (deceased) and Catherine Marx, individually and as Personal Representative of the Estate of Bradley Douglas Marx

Docket No.: 2020-CP-22-00991
TP File No.: 16868.00101

Dear Sir/ Madam:

Enclosed please find (1) original Defendants/Respondents Motion for Extension of Time to file Reply Brief and (1) copy of Defendants/Respondents Motion for Extension of Time to file Reply Brief. Please file the original and return the clocked copy to my office in the envelope provided.

With kind regards,

Sincerely,

Turner Padget Graham & Laney, P.A.

s/ Melody J. E. Breeden

Melody J.E. Breeden

MJEB: cp
Enclosures
Cc: Reese Boyd, III

Turner | Padgett

3833 Mayfair Street, Suite 101, Myrtle Beach, SC 29577

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