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**Nov 04 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Jennifer McCoy, Circuit Court Judge

Appellate Case No. 2021-001183

Joe Clemons,..... Appellant,

v.

Peggy H. Pinnell Agency, Inc., Peggy H. Pinnell Insurance Agency Inc.,  
State Farm Life Insurance Company, (jointly and severally liable),  
..... Respondents.

**RESPONDENTS' RESPONSE TO APPELLANT'S  
MOTION FOR FINAL BRIEF EXTENSION AND  
ABEYANCE REQUEST**

WHELAN MELLEN & NORRIS, LLC

By: s/Charles R. Norris

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*Attorneys for Respondents*

Charleston, South Carolina

November 4, 2022

Respondents, Peggy H. Pinnell Insurance Agency Inc.<sup>1</sup> and State Farm Life Insurance Company, file this response to Appellant's Motion for Final Brief Extension and Abeyance Request.

Appellant's motion does not provide an extension to a specified date. Respondents are agreeable to a reasonable extension to a specified date for Appellant to file his final brief. Respondents are opposed to an open-ended extension for Appellant to file his final brief.

In response to Appellant's request for recordings of hearings, Appellate has already filed his initial brief and, pursuant to SCACR 211, the final briefs shall be identical to briefs previously served except for adding references to the Record on Appeal and correcting any obvious typographical errors and misspellings in the initial brief. No other changes may be made. Rule 211, SCACR. Accordingly, the Appellant's request for recordings of hearings is futile because the Appellant cannot make substantive changes to his initial brief.

Additionally, the attachments to the Appellant's motion again demonstrate his request for production of the recordings has been thoroughly vetted by the South Carolina Court Administration, as well as Judge Roger Young's office. The Appellant's on-going contentions of discrepancies between the recordings and the transcript of the recordings have no merit.

*[SIGNATURE ON THE FOLLOWING PAGE]*

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<sup>1</sup> There is only Peggy H. Pinnell Insurance Agency, Inc.

Respectfully submitted,

WHELAN MELLEN & NORRIS, LLC

By: *s/ Charles R. Norris* \_\_\_\_\_

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**PROOF OF SERVICE**

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I certify that I have served the **RESPONDENTS' RESPONSE TO APPELLANT'S MOTION FOR FINAL BRIEF EXTENSION AND ABEYANCE REQUEST** on Appellant by electronic service on November 4, 2022, as reflected on email attached hereto and as referenced below:

Joe Clemons, Pro Se  
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Attorneys for Respondents

Charleston, South Carolina

November 4, 2022

## Traci Corallo

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**From:** Traci Corallo  
**Sent:** Friday, November 4, 2022 10:16 AM  
**To:** clemonswelding1@gmail.com  
**Cc:** Charles Norris; Kori A. McGraw  
**Subject:** Clemons v. Peggy H. Pinnell Agency, Inc., et al. - Appellate Case No. 2021-001183  
**Attachments:** 2022.11.04 Clemons - Respondants' Response to Appellant's Motion for Final Brief Extension and Abeyance Request.pdf; 2022.11.04 Clemons - Proof of Service - Response to Motion for Final Brief.pdf

Attached please find the following documents for service upon you:

1. Respondents' Response to Appellant's Motion for Final Brief Extension and Abeyance Request
2. Proof of Service

Thank you.



**Traci Corallo**  
**WHELAN MELLEN & NORRIS, LLC**  
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