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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2023-000607

James John Todd Kincannon,

Petitioner,

v.

Ashely Suzanne Griffith,
Moore Taylor Law Firm, P.A.,
Vance Stricklin, and Amber
Fulmer,

Respondents.

**PETITIONER'S REQUEST FOR ACCOMMODATION,
PURSUANT TO THE AMERICANS WITH DISABILITIES ACT,
FOR A TWO DAY EXTENSION TO FILE REPLY TO RESPONDENTS'
RETURN TO PETITIONER'S CERTIORARI PETITION**

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RETURN TO PETITIONER'S CERTIORARI PETITION**

INTRODUCTION

Petitioner **gratefully** acknowledges the Court's granting of his previous ADA requests in this matter for extensions based on Petitioner's psychiatric disabilities. Petitioner respectfully requests one final extension, a two-day extension of time, to July 26, 2023, to file Petitioner's Reply to Respondent's Return to Petitioner's certiorari petition.

Petitioner has diligently worked to prepare the Reply during the original eleven day deadline period plus the seven day extension granted by the Court in response to Petitioner's previous ADA request. Petitioner is approximately 90% finished with the Reply and needs two additional days to complete it due to his medical and disability status.

In particular, Petitioner's ADHD and bipolar disabilities can cause severe problems for Petitioner when trying to meet a court deadline for which complex drafting is required, as is the case with a reply to a return to a certiorari petition. Petitioner's symptoms have been very problematic in the past two weeks, substantially interfering with Petitioner's efforts to complete the Reply. Despite this, Petitioner has diligently worked to complete the Reply and is almost finished, but does need an additional two days to finish.

Petitioner **greatly** appreciates the Court's prior grace on these matters and would not trouble the Court with these ADA filings if it were at all avoidable.

Petitioner hates the need to file these ADA requests but there is simply no alternative. Petitioner's disabilities are described in detail in Petitioner's previous ADA filings in this matter, which are incorporated herein by reference.

FILING FEE

Petitioner was not charged a filing fee for his previous ADA accommodation requests in this matter, which Petitioner **greatly** appreciates, and accordingly does not submit one now.

CERTIFICATION OF COMPLIANCE WITH EXTENSION ORDER

Petitioner certifies that this extension request complies with this Court's order dated July 16, 2014. Petitioner is not seeking an extension due to the press of other business or for any other "ordinary" reason. Petitioner is not employed and has no other business to complete at the moment aside from the Reply. Petitioner seeks the two-day extension **solely** because of Petitioner's medical disabilities, which Petitioner believes qualifies as an extraordinary circumstance.

Respectfully submitted,

July 24, 2023

s/James John Todd Kincannon _____
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