

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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NOV 17 2023

APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

SC Court of Appeals

Hon. William P. Keesley, Circuit Court Judge

Appellate Case No. 2022-001749

James John Todd Kincannon,

Appellant,

v.

Ashely Suzanne Griffith,

Respondent.

**APPELLANT'S INITIAL REPLY BRIEF**

Other Counsel of Record:

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Moore Taylor Law Firm  
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West Columbia, SC  
Attorney for Respondent

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Simpsonville, SC 29681  
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Appellant Pro Se

## **APPELLANT'S REPLY BRIEF**

Appellant's Brief fully covers Appellant's arguments, and Respondent's Brief contains nothing that persuasively refutes Appellant's arguments. Accordingly, Appellant only submits this very short Reply Brief to orient the Court's attention to the most important issues in the matter.

First, Respondent's Brief contains numerous references to different lawsuits, some which involve Appellant and Respondent, and some of which involve Appellant and other parties. It appears that Respondent expects the Court to access the casefile records in those cases and treat them as part of this case, or otherwise take some form of notice of such matters. Appellant objects to this just as Appellant did at the trial court level.

If Respondent wanted to use proceedings in other cases as evidence in this case, Respondent could have put the filings and orders from those cases into this case's record. With the exception of a Final Divorce Decree, Respondent did not put any such material into the record of this case. Appellant therefore asks the Court to disregard all of Respondent's claims concerning cases whose filings and orders have not been made part of the record of this case. If the materials from those cases showed anything helpful to Respondent, Respondent's counsel could and should have put them into the record of this case.

As to the remaining material in Respondent's Brief, Appellant does not believe any reply is necessary as Appellant has fully stated his position in Appellant's Brief.

Respectfully submitted,

November 13, 2023

s/James John Todd Kincannon  
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**CERTIFICATE OF SERVICE**

The undersigned Appellant hereby certifies that he has, on the date below, properly served the foregoing on opposing counsel at the address submitted by opposing counsel to the Court for service in this case.

November 13, 2023

s/James John Todd Kincannon  
James John Todd Kincannon  
Appellant Pro Se

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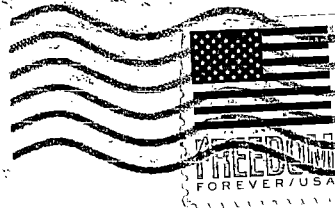
South Carolina Court of Appeals

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