

In The State of South Carolina Court of Appeals

Appeal from GREENVILLE COUNTY Court of Common Pleas

Charles B. Simmons Jr
C.A. No.: 2020-CP-23-00939
Appellate Case No, 2020-001699

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NOV 27 2023
SC Court of Appeals

Kenneth Curtis.....Respondent
v.
Cynthia Glenn..... Appellant.

Return to Respondent's 2nd Motion to File Outside of Deadlines

On October 4, 2023, I received an undated motion by Respondent requesting permission to file outside of timeline. I received a second similar motion on Nov. 20, 2023. I am restating a portion of the previous return.

Curtis argues that he should be granted this extension because his attorney has resigned. To date Curtis has failed to offer any evidence to the court that he ever retained an attorney for the appeal. Curtis states:

“Attorney of record Michael Dodd Esq. has resigned representation of Respondent Kenneth Curtis in this case therein causing unavoidable preparation delays.”

Mr. Curtis has shown no proof that Mr. Dodd was ever retained to represent him in the Court of Appeals. Filings to be removed as the attorney of record by Mr. Dodd are dated September 7, 2022 in which Mr. Dodd states,

“Kenneth Curtis has, since the day of the final order in the circuit court case was issued on November 17, 2020... instructed counsel, Michael B. Dodd not to

represent him in any appeal of the matter.”

According to Mr. Curtis’ trial attorney, he has had three years to prepare for this appeal; therefore the delay is unwarranted.

The Motion for Dismissal does not have a justified cause and only brings new arguments in the appeal that were not previously part of the court cases.

The appeal was filed timely and according to rules. This appellant retains all of her rights to such appeal. .

The Motion to Dismiss is intended to belabor the process and overburden the court as well as the appellant.

WHEREAS; Respondent is abusing the process, is outside of timeline and is presenting new arguments not argued in the lower courts, Appellant prays of The Court that Respondent’s Motion to submit Motion to Dismiss outside of timeline be denied.

Cynthia Glenn, Date: 11/24/23
Autograph of Cynthia Glenn, Su Juris
Post Office Box 87
Gray Court, South Carolina [29645]
(864) 350-2830
APPELLANT

BRIEF OF APPELLANT THE STATE OF South Carolina
In The court of appeals
APPEAL FROM GREENVILLE COUNTY Court of Common Pleas

Charles B. Simmons Jr
C.A. No.: 2020-CP-23-00939
Appellate Case No. 2020-001699

Kenneth Curtis, Respondent.
V.
Cynthia J. Glenn, Appellant,

PROOF OF SERVICE

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I certify that I have served **Return to Respondent's Motion to Dismiss and Return to Respondent's 2nd Motion to File Outside of Deadlines** by depositing a copy in the United States Post Office, postage prepaid, on 11/24/23 to Kenneth Curtis 113 Edwards Rd. Marietta South Carolina [29661].

Cynthia Glenn, Date: 11/24/23

Autograph of Cynthia Glenn, Su Juris
Post Office Box 87
Gray Court, South Carolina [29645]
(864) 350-2830
APPELLANT

In Care of
Cynthia Henn
Post Office Box 87
8 Gray Court, South Carolina

[29645-087]

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SC Court of Appeals

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Columbia, South Carolina

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