

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

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Case No. 2020-CP-42-00055  
Appellate Case No. 2024-001239

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Dr. Lad Santiago,

Appellant.

v.

Stephen N. Garcia, as Attorney for  
Oscar Avila Hernandez, et.al.,

Respondents.

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**APPELLANT'S SECOND MOTION FOR EXTENSION  
OF TIME TO FILE INITIAL BRIEF**

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COMES NOW, Appellant Dr. Lad Santiago, Pursuant to Rule 263 of the South Carolina Rules of Appellate Procedure, who respectfully requests and moves that this Court grant a second extension of time to file his Initial Brief. The first extension request was granted, setting the current deadline to November 22, 2024. The proposed extended deadline would be January 3, 2025.

The undersigned has been and is currently suffering from the adverse health effects of Long-Covid, which have been further complicated by current and multiple bouts of Covid. He has also most recently been afflicted with an upper respiratory condition, all of which directly

impacts his ability to function effectively. As a result, he has also been bedridden frequently. Furthermore, this has been compounded by the direct and lasting effects of Hurricane Helene. Dr. Santiago, his household and businesses have been directly impacted by the effects of this storm, which effects continue to persist. We have endured severe devastation in many aspects of our daily lives, and are currently in the process of recovery, inclusive of, but not limited to, the loss of electricity and water, trees that have crashed through house roofs, and a into a storage unit that was completely destroyed, many fallen trees (more than 35+) on our driveway, and at least that many trees at our barn area, damaged barn and shed buildings, downed fence lines, a crushed automobile, damaged horse trailers and utility trailers and loss of livestock. Although the electrical power and our water was restored, one-third of our house remained without electricity until the late afternoon of November 8, 2024, due to storm damage sustained to our electrical lines within our house. Half of our home remains without heat due to a storm damaged HVAC system. Furthermore, our home sustained interior damage due to multiple leaks caused by a damaged roof that resulted from the hurricane. This does not account for the frustrations and delays in repairs caused by contentions with the insurance adjusters, which have yet to be fully resolved. We have yet to ascertain other damages that have been caused to other parts of our property from this catastrophe.

The Appellant's mother, who is 99.5 years old and lives with us, whom we serve as her fulltime caretakers, was frightened and stressed from the effects of Hurricane Helene, and this took extra focus and attention from us for her wellbeing and survival. Thankfully, she has survived and is in the process of recovering from the effects of the hurricane. We were fortunate that we were spared physical injury and death, although emotionally it has been tasking, and at times overwhelming. These events have impeded us from functioning fully as we are normally

inclined to do. This has been an epic, devastating and unprecedented event in our lives, as it has been for many others. Needless to say, we are still deep in the throes of the aftermath in the multitude of areas that are pressing upon us and demanding our attention.

These circumstances and conditions have unfortunately, but necessarily, taken away from the focus required for a proper and complete Initial Brief. While the undersigned is working diligently to prepare his Initial Brief under the aforementioned extreme conditions, additional time would allow him to thoroughly and properly effectuate this task. Therefore, the Appellant asks for the indulgence of the court in this request. For the foregoing reasons and the impending Holidays forthcoming, the Appellant respectfully requests a 42-day extension of time to complete and file his Initial Brief. This extension would set the deadline to no sooner than Jan 3, 2025. A \$50.00 motion fee check is enclosed.

Respectfully submitted,

Dated: November 19, 2024

/s/Dr. Lad Santiago  
Dr. Lad Santiago  
5041 North Blackstock Road  
Spartanburg, South Carolina 29303  
(864) 576-2983  
Pro Se for Appellant

**RECEIVED**

**Nov 20 2024**

**SC Court of Appeals**

**PROOF OF SERVICE OF  
APPELLANT'S SECOND MOTION FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF**

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on this 19<sup>th</sup> day of November, 2024, he served counsel for the Defendants with a copy of the Appellant's Second Motion for Extension of Time To File Initial Brief in this matter by mailing a copy of the same by the United States Mail with first class postage prepaid to the following address:

Stephen N. Garcia, Esquire  
604 Pettigru Street  
Greenville, South Carolina 29601

**RECEIVED**

**Nov 20 2024**

**SC Court of Appeals**

**LETTER TO THE APPELLATE COURT CLERK  
FILING NOTICE FOR SECOND EXTENSION OF TIME  
TO FILE INITIAL BRIEF**

Dr. Lad Santiago  
5041 North Blackstock Road  
Spartaburg, South Carolina 29303

November 19, 2024

The Honorable Jenny Abbott Kitchings Clerk,  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Dr. Lad Santiago, Appellant v. Oscar Avila Hernandez, et.al., Respondents  
Appellate Case No. 2024-001239

Dear Ms. Kitchings:

Enclosed for filing is Appellant's Second Motion For An Extension of Time To File Initial Brief in the above case. Also enclosed are the following:

- (1) Proof of service of Appellant's Second Motion For An Extension of Time To File Initial Brief on the Respondents.
- (2) Filing fee of \$50.00

cc: Stephen N. Garcia, Esquire  
604 Pettigru Street  
Greenville, South Carolina 29601  
Attorney for Respondents

Sincerely,

/s/ Dr. Lad Santiago

Dr, Lad Santiago  
5041 North Blackstock Road  
Spartaburg, South Carolina 29303  
Pro Se for Appellant