

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Alison R. Lee, Circuit Court Judge

RECEIVED

SEP 12 2013

Case No: 2012-212896

SC Court of Appeals

Charles Taylor,

Appellant,

v.

Thomas Davis and
State Farm Mutual Automobile Insurance Company, Respondents,

Appellant's Reply to Respondent State Farm's 8-16-13

MOTION FOR EXTENSION OF TIME TO FILE FINAL BRIEF

Appellant reply to the above motion as follows:

(1). That Appellant opposes granting Respondent's motion to file its final brief because they've had more than ample time until **now**, to do so & everyone else have complied with the rules in this regards--filing their final briefs--Appellant Taylor's dated 8-15-2013 & Respondent Davis filed his dated 8-16-2013; except this Respondent failed to file his to **now**, in violation of the applicable rules & now he want to be bail out by an extension without good--just cause shown; other than his hope that his motion to strike/dismiss is granted; that's no basis not to timely file;

(1)

(2). Furthermore, Respondent has given no good reason why his final brief could not have been filed before **now**; the other Respondent-Davis filed his;

(3). Also, the pages in the amended record on appeal, in any case, are numbered consecutively R.p.1 thru R.p.69; and anyone could reference any lines, spots, paragraphs, pages, etc. therein; notwithstanding anything else, alleged in Respondent State Farm (3) Motions total-dated 8-16-13; even if such allegation were all true; which they are not; but even if they were; Respondent State Farm final brief still could & should have been filed-certainly before now in any case; as was the other Respondent-Davis & Appellant's final briefs filed as stated---in a timely manner;


(4). Also, Appellant opposes granting the subject motion-s, for any & all, of the reasons stated Above; **AND** in his reply to Respondent State Farm other 2 motions; (see Appellant's 9-11-13 Reply to Respondent State Farm other 2 Motions for All other-additional Opposing Reasons);

(5). Finally, after such willful failure by Respondent State Farm to knowingly file within the rules; (**and again-certainly before now in any case**); granting such extension of time now would indeed legally no doubt prejudice all the other parties, certainly & especially the Appellant; and especially because there was no good reason given for the failure to timely file in the first place per all the above herein and all the attachments herewith;

Accordingly, Appellant moves that the subject motion-s of Respondent State Farm be denied, so the case can move to a more timely final resolution of this now (6) years old litigation-case.

September 11, 2013

Sumter, South Carolina

BY: 
Charles Taylor, Appellant
Post Office Box 3652
Sumter, SC. 29151/803-883-7005

Note: The roa pages 1-69 alluded to in para. 3 above; such want change-regardless-because they are precisely the sum total of all parties designation of matter--see index pg in final amended roa.

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Alison R. Lee, Circuit Court Judge

Appellate Case No: 2012-212896

Charles Taylor,

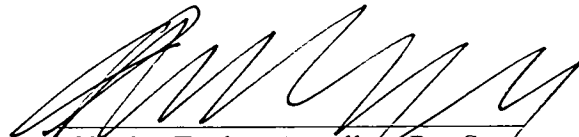
Appellant,

v.

Thomas Davis and
State Farm Mutual Automobile Insurance Company, Respondents,

PROOF OF SERVICE

I hereby certify that a copy of: Appellant's Reply to Respondent State Farm's 8-16-13 Motion for Extension of Time to File Final Brief; was served upon Respondents Thomas Davis & State Farm Mutual Automobile Insurance Company to its counsel below by depositing same in the U.S. Mail, from Sumter, SC. on the 11th day of September, 2013, w/1st class duly affixed postage & a return address indicated clearly thereon the envelope, addressed as follows:



Charles Taylor, Appellant Pro Se
Post Office Box 3652
Sumter, SC 29151/(803) 883-7005

Mr. Thomas Davis, Respondent
PO Box 773
Manning, S.C. 29105

State Farm Mutual Automobile
Insurance Company/Respondent
Mr. James B. Lybrand, Jr., Esq.
PO Box 58 / Columbia, S.C. 29202

RECEIVED
SEP 12 2013
SC Court of Appeals