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**Feb 20 2025**

**SC Court of Appeals**

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
COURT OF COMMON PLEAS

Judge G. D. Morgan

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Case No. 2024-CP-23-00312  
Appellate Case No.: 2024-00731

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Christopher Jones,

Appellant,

v.

D&B Real Estate Ventures, LLC.;  
Darius Jones; Bradley Robinson,

Respondents.

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**RESPONDENTS' RESPONSE TO APPELLANT'S MOTION FOR EXTENSION  
OF TIME**

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Respondents D&B Real Estate Ventures, LLC, Darius Jones, and Bradley Robinson, by and through undersigned counsel, respectfully submit this reply to Appellant Christopher Jones' "Motion for Extension of Time".

Rule 262(c), SCACR, requires all documents filed with the appellate court to be served on all parties, including Respondent's counsel. Appellant failed to serve Respondents' counsel with a copy of his Motion for Extension of Time. Respondents' counsel has learned that the Motion was filed on February 5, 2025. On February 7, 2025, a Deficiency Letter regarding the motion fee was sent to Appellant from the court via email. Counsel for Respondents was copied on this email

from the court, which is how Respondents learned about the filing of the Motion for Extension of Time.

Appellant has, again, provided zero justification for further delay. To the extent the Appellant's social media representations have an ounce of truth to them, it appears his discretionary travel schedule to the likes of Hong Kong and Mumbai are taking precedence over this appeal, to include the ongoing prejudice to my clients (attached hereto and incorporated herein by reference as "**Exhibit A**" are copies of Appellant's Facebook posts, one of which is dated on same day as Appellant's subject Motion and the other dated two days later).

Again, Appellant has consistently failed to serve all parties with copies of documents he files with this Court. Appellant has also consistently failed to comply with filing deadlines and has consistently failed to provide a valid explanation for same, including his recent delay. Appellant again cites to no authority allowing such untimeliness. Procedural deadlines under the SCACR are not discretionary. Failure to meet them undermines judicial efficiency and imposes unnecessary burdens on the Court and the opposing party. Appellant's disregard for this deadline as well as his failure to serve all documents on Respondents is not an isolated error; but, part of a broader pattern of procedural noncompliance and misrepresentation that has unnecessarily prolonged and undermined these proceedings, greatly prejudicing the Respondents. This is, of course, what led to the Respondents' prior Motion to Dismiss.

The January 6, 2025, Order ("Order") denying the Respondents' Motion to Dismiss included the following clear directives from this Court:

Appellant shall adhere to all filing deadlines and shall serve Respondents with all filed documents as required by the South Carolina Appellate Court Rules. *See e.g.* Rule 240(d), SCACR ("The motion or petition shall be filed with the clerk of the appellate court, and a copy shall be served upon each party.") ... Failure to adhere to the filing deadlines and serve Respondent

as required under the South Carolina Appellate Court Rules will result in the dismissal of the appeal.

Order, p. 1.

In his motion, Appellant again asserts that there is no prejudice to the Respondents by allowing Appellant a standard extension of time, when in fact, Respondents have been prejudiced by Appellant's numerous delays throughout this case. Respondents have incurred, and continue to incur, damages as a result of: being unable to sell the property at issue for over a year due to the pending lien and appeal; the inability to obtain the financing necessary to properly repair the damages caused by Appellant to the property; the ongoing time and expense of defending this frivolous lawsuit and appeal; and the inability to recognize the profits that would have otherwise allowed Respondents to proceed with other business opportunities.

Given Appellant's clear and repeated failure to adhere to fundamental rules of procedure, Appellant's proclivity to misrepresent facts, Appellant's plain violations of the prior Order of this Court, and the extraordinary prejudice that Respondents continue to incur, Respondents respectfully request that this Court deny Appellant's Motion for Extension of Time and dismiss the present appeal<sup>1</sup>. Otherwise, Appellant will simply continue his abuse of process, further damaging my client in the process, as well as the integrity of this Court.

**WHEREFORE**, for the reasons stated herein, Respondents respectfully request that this Court deny Appellant's Motion for Extension of Time and dismiss the present appeal.

Respectfully submitted this 20<sup>th</sup> day of February 2025.

HOLDER, PADGETT, LITTLEJOHN + PRICKETT, LLC

Greenville, South Carolina

s/ M. Stokely Holder  
M. Stokely Holder

<sup>1</sup> See Motion to Dismiss filed contemporaneously herewith by Respondents.

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EXHIBIT A



Chris Jones



Friends

See all friends

2,720 friends



Demarcus Seaborn  
2 mutual friends



Jameka Shatek Murphy



Audrey Latimore



Artrell Mckinney



Stacy Yearby



Jacquie Irby Duckett



Author Cedric Lewis



Barabara Martin



Byron Epps



Marletha Durham replied · 2 Replies



Write a comment...



Chris Jones is at Mumbai.

February 3 at 10:49 AM · Mumbai, India



Putting in work. No rest for the weary. Persevere!!



LOCAL BUSINESS

Mumbai



15

6 comments



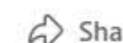
Like



Comment



Send



Share



Chris Jones is at Canopy by Hilton Dubai Al Seef.

January 24 at 6:53 PM · Dubai, United Arab Emirates



Ready For The World





Search Facebook



Chris Jones



7

2 comments



Like



Comment



Send



Share

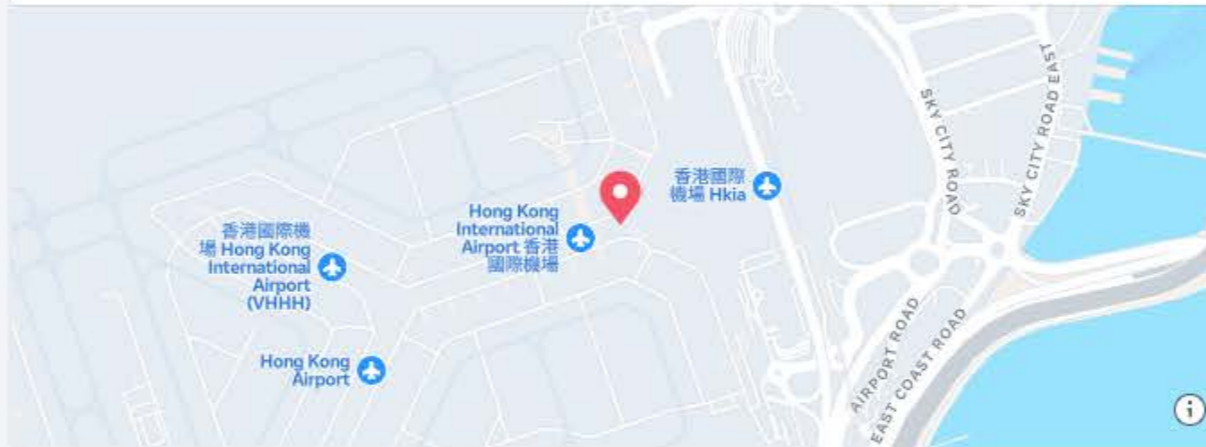


Chris Jones is at Ocean Park Hongkong.



February 7 at 7:05 PM · Hong Kong · 🌐

Here we grow again. Biocrete Global on the move



AMUSEMENT & THEME PARK

Ocean Park Hongkong

7



Like



Comment



Send



Share

Write a comment...



Friends

See all friends

2,720 friends



Demarcus Seaborn  
2 mutual friends



Jameka Shatek Murphy



Audrey Latimore



Artrell Mckinney



Stacy Yearby



Jacquie Irby Duckett



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SC Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

THE HONORABLE G.D. MORGAN

Appellate Case No. 2024-00731  
Circuit Court Case No. 2024-CP-23-00312

CERTIFICATE OF SERVICE

I, the undersigned attorney for the Respondents, D&B Real Estate Ventures, LLC, Darius Jones and Bradley Robinson, do hereby certify that I have served the Respondents' Response to Appellant's Motion for Extension of Time on the Appellant, Christopher Jones by sending a copy via email to [intljonesc@gmail.com](mailto:intljonesc@gmail.com) and via mail to 309 Perry Ave., Greenville, SC 29601. I also certify that I have served the Respondents' Response to Appellant's Motion for Extension of Time on the South Carolina Court of Appeals by depositing it in the United States Mail, postage prepaid, on February 20, 2025, addressed to The Honorable Jenny Abbott Kitchings, Clerk of Court, P.O. Box 11629, Columbia, SC 29211, and by electronic mail at: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).



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Robinson*

February 20, 2025