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**Mar 27 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' REPLY TO APPELLANT'S MOTION FOR LEAVE TO FILE  
RETURN OUT 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 Leave to File Return Out of Time."

Pursuant to *Rule 240(e), SCACR*, the deadline for Appellant to file a Return to Respondents' Motion to Dismiss was March 3, 2025. However, Appellant did not file his Motion for Leave to File Return Out of Time until March 13, 2025, well after the permissible deadline.

This Court issued an order on January 6, 2025 (the "Order") denying the Respondents' Motion to Dismiss and, within in, included the following clear directives:

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.

This untimely request constitutes yet another instance of Appellant’s violation of this Court’s Order, the Appellant’s repeated failure to comply with the South Carolina Appellate Court Rules (SCACR), and his ongoing pattern of procedural abuse. Given Appellant’s clear history of noncompliance, coupled with the substantial prejudice suffered by Respondents, this Court should reject his motion and dismiss the appeal.

Appellant, once again, asserts that his delay does not prejudice Respondents and that he should be granted a routine extension. This argument is entirely without merit and wholly unsupported. Respondents have suffered significant prejudice due to Appellant’s continued procedural violations and delays, including:

1. Inability to sell the subject property for over a year due to the pending mechanic’s lien and appeal, preventing Respondents from realizing anticipated profits.
2. Obstruction of necessary financing to repair damage caused by Appellant to the property.
3. Substantial financial burden incurred from defending this meritless appeal, further compounding the costs already borne in the underlying litigation.
4. Missed business opportunities, as Respondents remain unable to allocate resources toward new ventures due to Appellant’s prolonged litigation tactics.

This is not an isolated incident. Appellant has repeatedly disregarded procedural deadlines, the Order of this Court, filed meritless objections, and engaged in tactics designed to stall these

proceedings at every turn. His continued abuse of process not only imposes unnecessary hardship on Respondents but also undermines the integrity of the appellate system.

Appellant has demonstrated a blatant disregard for the rules governing appellate procedure, the prior orders of this Court, and the fundamental obligation to litigate in a timely manner. Given his persistent failure to adhere to procedural deadlines, coupled with the ongoing harm inflicted on Respondents, this Court should deny Appellant's Motion for Leave to File Return Out of Time and dismiss this appeal in its entirety.<sup>1</sup> Otherwise, Appellant will simply continue his frivolous abuse of process, further damaging Respondents and undermining the integrity of this Court.

**WHEREFORE**, for the reasons stated herein, Respondents respectfully request that this Court deny Appellant's Motion for Leave to File Return Out of Time and dismiss the present appeal with prejudice.

Respectfully submitted this 27<sup>th</sup> day of March 2025.

HOLDER, PADGETT, LITTLEJOHN + PRICKETT, LLC

*s/M. Stokely Holder*  
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<sup>1</sup>See Response to Appellant's Motion for Extension of Time and Motion to Dismiss filed February 20, 2025 by Respondents.

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In the Court of Appeals

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' Reply to Appellant's Motion for Leave to File Return Out 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' Reply to Appellant's Motion for Leave to File Return Out of Time on the South Carolina Court of Appeals by depositing it in the United States Mail, postage prepaid, on March 27, 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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*Attorneys for the Respondents D&B Real Estate Ventures, LLC, Darius Jones and Bradley  
Robinson*

March 27, 2025

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**Via U.S. Mail and Email**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
ctappfilings@sccourts.org

**RE: Christopher Jones v. D&B Real Estate Ventures, LLC; Darius Jones; Bradley  
Robinson  
Circuit Court Case No.: 2024-CP-23-00312  
Appellate Case No.: 2024-00731**

Dear Ms. Kitchings,

Please find enclosed herewith for service upon the court Respondents' Reply to Appellant's Motion for Leave to File Return Out of Time, along with a Certificate of Service for same.

Should you have any questions or concerns, feel free to contact our office.

Regards,

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



Carolyn Denney  
Paralegal

Enclosures

cc: *Christopher Jones*