

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM MCCORMICK COUNTY
Court of Common Pleas
Walton J. McLeod IV, Circuit Court Judge

Case No.: 2024-000831

RECEIVED

Apr 18 2025

SC Court of Appeals

Robert Jay Lagroon,

Appellant,

v.

Crystal Suggs and Scott Suggs,

Respondents.

Respondents' Joint Petition to be Allowed to File and Serve Initial Brief and Designation of
Matter

Respondents Crystal Suggs and Scott Suggs, petition this Court for an order extending the time to file their initial brief and designation of matter to be included in the record of appeal. Per a letter from the court of appeals dated April 1, 2025, this material was due on March 20, 2025.

As explained in a letter sent to the Court of Appeals on April 1, 2025, which is attached as Exhibit A, Respondents did not know Appellant Robert Jay Lagroon had filed his initial brief and designation of matter. He never served those documents on Respondents. Lagroon's documents claim that he served the parties "by United States Mail and by electronic mail addressed as follows:

Billy J. Garrett, Jr., Esquire
Jane Hawthorne Merrill, Esquire
Robert Jamison Tinsley Jr., Esquire
Tinsley & Tinsley, P.C.
The Garrett Law Firm, P.C.
109 Oak Ave.
Greenwood, SC 39646"

The Zip Code he listed is incorrect as the correct Zip code is 29646.

Despite what Appellant claims, Appellant has not served counsel for Respondents of any documents he has filed with the court of appeals. Most importantly, he never served the notice of appeal, which is required to give the Court jurisdiction over the appeal.

Respondents Crystal Suggs and Scott Suggs, therefore, request that the Court retract its letter dated April 17, 2025, and grant Respondents a thirty-day extension to serve and file their initial brief and designation of matter in this case.

IT IS SO MOVED

Respectfully Submitted,



Sen. Billy J. Garrett Jr.
Garrett Law Firm, P.C.
109 Oak Ave.
Greenwood, SC 29646
864-229-8000
billygarrettjr@yahoo.com
Attorney for Respondent Crystal Suggs

R. Jamison Tinsley Jr.
Tinsley & Tinsley, P.C.
109 Oak Ave.
Greenwood, SC 29646
864-223-0770
Tinslerj@gmail.com
Attorney for Respondent Scott Suggs

This 18th day of April, 2025.

EXHIBIT A

Tinsley & Tinsley, P.C.
Attorneys at Law
109 Oak Ave.
Greenwood, SC 29646.
(864) 223-0770
Fax: (864) 377-8278

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Apr 18 2025
SC Court of Appeals

April 1, 2025

Via e-mail: kpryor@sccourts.org
S.C. Court of Appeals
Catherine S. Harrison, Chief Deputy Clerk

Robert Jay Lagroon v. Crystal Suggs and Scott Suggs
Case No. 2024-000831

Dear Ms. Harrison:

I am writing in response to your letter dated April 1, 2025. I represent Respondent Scott Suggs in the above case. I was surprised to receive your letter that stated the Respondents' initial brief was late because I never received Appellant Robert Jay Lagroon's initial brief.

After receiving your letter, I got onto the C-Track Public Access on the Court's web site. I was able to pull Appellant's initial brief from there. I see where he filed it on February 18, 2025. He claims that he served the parties "by United States Mail and by electronic mail addressed as follows:

Billy J. Garrett, Jr., Esquire
Jane Hawthorne Merrill, Esquire
Robert Jamison Tinsley Jr., Esquire
Tinsley & Tinsley, P.C.
The Garrett Law Firm, P.C.
109 Oak Ave.
Greenwood, SC 39646"

The Zip Code he listed is incorrect as the correct Zip code is 29646.

I am not surprised that I have not received this document as that behavior has been Appellant's pattern in this litigation. I have never received any of the documents that Appellant has filed with the Court, including the Notice of Appeal, so the Court should dismiss this case for lack of jurisdiction.

I have spoken with Senator Billy J. Garrett Jr. and Circuit Court Judge Jane H. Merrill who represent Respondent Crystal Suggs in this matter. Neither one of them has ever received any of the documents that Appellant has filed with the Court in this appeal either.

Please let me know how I need to proceed as to whether I need to file a formal motion with a filing fee given Appellant's failure to serve his initial brief or any other document on Senator Garrett or me in this matter.

Thank you for your assistance in this matter.

Yours truly,



R. Jamison Tinsley Jr.

cc: Robert Jay Lagroon
Senator Billy J. Garrett Jr.
Honorable Jane H. Merrill

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Case No.: 2024-000831

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Proof of Service

I certify that I have filed and served Respondents' Joint Petition to be Allowed to File and Serve Initial Brief and Designation of Matter on the below date by mailing a copy to S.C. Court of Appeals at PO Box 11629, Columbia, SC 29211 and e-mailing a copy to the following: S.C. Court of Appeals at ctappfilings@sccourts.org and Robert Jay Lagroon at rlagroon63@aol.com. This method of service and filing is based upon the Supreme Court's order dated April 24, 2024.



R. Jamison Tinsley Jr.
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109 Oak Ave.
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864-223-0770
Tinslerj@gmail.com

Greenwood, South Carolina

April 18, 2025

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Fax: (864) 377-8278

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SC Court of Appeals

April 18, 2025

Via U.S. Mail and e-mail: ctappfilings@sccourts.org

S.C. Court of Appeals
Jenny Abbott Kitchings, Clerk
PO Box 11629
Columbia, SC 29211

Robert Jay Lagroon v. Crystal Suggs and Scott Suggs
Case No. 2024-000831

Dear Ms. Kitchings:

Please find attached a copy of Respondents' Joint Petition to be Allowed to File and Serve Initial Brief and Designation of Matter in the above-referenced matter along with a proof of service and a \$50.00-check for the filing fee. I am serving appellant simultaneously via e-mail.

Thank you for your assistance in this matter.

Yours truly,


R. Jamison Tinsley Jr.

cc: Robert Jay Lagroon (via email: rlagroon63@aol.com)