

RECEIVED

Jul 07 2025

SC Court of Appeals

MOTION FOR EXTENSION

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

APPEAL FROM GREENVILLE
COUNTY
Court of Common Pleas

Alex Kinlaw, Circuit Court Judge

AppellateCase No. 2024-001914

J. Mereinda Fisher, Individually, and as Respondent,
Member of Fisher and Reid. LLC,

V.
Cynthia J. Glenn, individually, and as
Member of Fisher and Reid. LLC, and
Carolina Birth Center, LLC d/b/a
- Carolina Water Birth, Defendants,

Respondent

Of which Cynthia J. Glenn, individually, and as
Member of Fisher and Reid, LLC is the Appellant

COMES NOW the Appellant, Cynthia J. Glenn, and respectfully requests an extension of time to file the Appellant's Reply Brief in the above-captioned matter, and in support thereof states as follows:

1. The Respondent's Initial Brief was filed and court stamped on June 23, 2025, but the Appellant received both the initial and corrected briefs on July 3, 2025. This delay significantly prejudiced the Appellant's ability to respond.

2. The Appellant is proceeding as a *traditional filer* in this matter and has previously informed Respondent's counsel that she cannot accept electronic filings from them. This position is supported by South Carolina law, which recognizes the challenges faced by *pro se* litigants regarding electronic communication, and further supported by federal case law that emphasizes the less stringent standards applied to *pro se* pleadings to ensure access to justice. See, e.g., *Conley v. Gibson*, 355 U.S. 41, 48 (1957); *Haines v. Kerner*, 404 U.S. 519 (1972); *Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938); *Boag v. MacDougall*, 454 U.S. 364 (1982); *Estelle v. Gamble*, 429 U.S. 97 (1976); *Sherar v. Cullen*, 481 F.2d 946 (1973). This position is also supported within South Carolina Electronic Filing Policies and Guidelines 4. E-Filing and E-Service (5)(A)
3. During the majority of the 10 days after the filing of the Respondent's Initial Brief, and until the corrections were received, the Appellant was out of town and lacked access to a computer or any other means to respond to the Respondent's Initial Brief or process the corrections promptly. This unforeseen circumstance warrants the exercise of discretion under Rule 240, SCACR, which permits extensions of time for cause shown.
4. This unavoidable delay in receiving and processing the corrected brief has significantly impacted the Appellant's ability to prepare and file a timely Reply Brief.
5. An extension is necessary to allow the Appellant sufficient time to review the corrected brief and prepare a comprehensive and accurate Reply Brief that

addresses the arguments presented. Furthermore, this appeal implicates fundamental constitutional rights of the Appellant, including due process and access to justice, as the resolution of this matter directly affects the Appellant's livelihood and professional standing. Denying a reasonable extension under these circumstances would effectively abridge the Appellant's ability to fully present her case and defend these constitutional interests before this Honorable Court.

WHEREFORE, the Appellant respectfully requests that this Honorable Court grant an extension of time for the filing of the Appellant's Reply Brief for a period of 30 days from the original due date.

Respectfully submitted,

Cynthia Glenn

without prejudice
Cynthia-J. Glenn TM Su Juris
411 West Main Street, ICO Unit 87
Gray Court, South Carolina 29645
864.350.2830
Appealing

Dated: July 5, 2025

RECEIVED

Jul 07 2025

SC Court of Appeals

PROOF OF SERVICE

THE STATE OF SOUTH CAROLINA
In The Court of
Appeals

APPEAL FROM GREENVILLE
COUNTY
Court of Common Pleas
Alex Kinlaw, Circuit Court Judge
Appellate Case No.2024-001914

J. Mereinda Fisher, Individually, and as Respondent,
Member of Fisher and Reid. LLC,

V.
Cynthia J. Glenn, individually, and as
Member of Fisher and Reid. LLC, and
Carolina Birth Center, LLC d/b/a
- Carolina Water Birth, Defendants,

Respondent

Of which Cynthia J. Glenn, individually, and as Member of Fisher and Reid,
LLC is the Appellant

I, Cynthia J. Glenn, certify that on this 5th day of July, 2025, I served the foregoing MOTION FOR EXTENSION upon counsel for the Respondent, J. Mereinda Fisher, by mailing a copy via United States Postal Service, first-class mail, postage prepaid, to the following address: Duggan & Hughes Law Firm 457 Pennsylvania Ave# B, Greer, SC 29650.

Cynthia J. Glenn

without prejudice
Cynthia-J: Glenn TM Su Juris
411 West Main Street, ICO Unit 87
Gray Court, South Carolina 29645
864.350.2830
Appealing

Dated: July 5, 2025