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**Jul 22 2025**

**SC Court of Appeals**

**IN THE COURT OF APPEALS  
STATE OF SOUTH CAROLINA**

Christopher Lawton,  
Appellant,

v.

Discover Bank,  
Respondent.

Court of Appeals Case No. 2025-000833  
Lower Court Case No. 2024-CP-23-05217

**MOTION FOR LEAVE TO FILE AMENDED INITIAL BRIEF  
(Appellant Appearing In Propria Persona)**

NOW COMES the Appellant, Christopher Lawton, appearing in propria persona, and respectfully moves this Honorable Court for leave to file an Amended Initial Brief of Appellant pursuant to SCACR Rule 208(b). In support of this Motion, Appellant states the following:

1. Appellant timely filed the Initial Brief of Appellant by email on July 19, 2025, pursuant to the Court's prior extension.
2. Due to extreme time constraints, technical difficulties, and the urgent need to meet the filing deadline, several constitutional and procedural issues raised by the Appellant during the trial court proceedings were inadvertently omitted.
3. These omitted matters are documented in the official transcript of the lower court hearing and include, but are not limited to:
  - Lack of Article III standing under *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992).
  - Procedural due process violations under *Mullane v. Central Hanover Bank*, 339 U.S. 306 (1950).
  - Summary judgment impropriety under Rule 56 and absence of genuine issue of material fact.
  - Constitutional limitations under Article I, Section 10, Clause 1 (No State shall pass any Law impairing the Obligation of Contracts).
  - Fourteenth Amendment due process and equal protection issues, including historical ratification arguments.

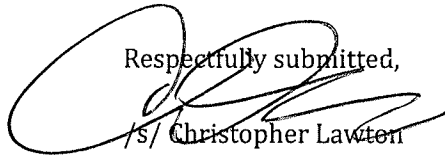
- Right to a civil jury trial under the Seventh Amendment of the U.S. Constitution.

4. Appellant preserved these issues in the trial transcript and now seeks to fully present them to this Court to avoid waiver and to ensure a just appellate review.

5. This Motion is made in good faith and not for delay. No prejudice will result to Respondent from the submission of an amended brief, and this request serves the interest of justice.

WHEREFORE, Appellant respectfully requests that this Honorable Court grant leave to file an Amended Initial Brief of Appellant and allow such brief to be submitted within 7 days of the entry of an order granting this Motion.

Respectfully submitted,



/s/ Christopher Lawton

Christopher Lawton

Appearing in propria persona

chrislawton59@gmail.com

864-325-6400

Dated: July 20, 2025