

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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NOV 21 2025
SC Court of Appeals

TDS of Charleston, LLC,
Respondent,

v.

Kenneth Edmondson,
Appellant.

Appellate Case No.: 2024-000756

MOTION FOR EXTENSION OF TIME

(To File Appellant's Reply to Respondent's Return to Motion to Recall Remittitur)

Comes now **Kenneth Edmondson**, Appellant, pursuant to **Rules 240 and 263, SCACR**, and respectfully moves this Court for an order extending the time to file:

"APPELLANT'S REPLY TO RESPONDENT'S RETURN TO MOTION TO RECALL REMITTITUR."

Appellant requests an extension of **four (4) days Thursday, 2025**, to complete and file the Reply.

GROUND FOR EXTENSION

1. Appellant is proceeding **pro se**, without the assistance of counsel, and requires additional time to ensure full compliance with all appellate rules.
2. The Respondent's Return raises **complex procedural and jurisdictional issues**, including Rule 260(a) interpretations, alleged dates of receipt, and matters involving due process and the Court's inherent authority.
3. Appellant has exercised **due diligence** but requires adequate time to research and prepare a comprehensive reply addressing:
 - o Respondent's claims of untimeliness.

- o Mischaracterizations of the factual record,
 - o The legal and constitutional bases for recalling the remittitur.
4. Additional time is necessary due to **circumstances outside Appellant's control**, including delays in receiving mail on 11/15/2025, processing delays, and the need to correct the Record under Rule 56 and Rule 240 motions.
 5. No prejudice will result to Respondent from the granting of this motion.
 6. The interests of **justice, fairness, and due process** favor allowing an extension so that the Court may receive a fully developed reply.

PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests that this Honorable Court:

1. **Grant an extension of at least four (4) days** to file the Reply to Respondent's Return to the Motion to Recall Remittitur;
2. Accept the reply when filed within the extended time; and
3. Grant any such further relief the Court deems just and proper.



Respectfully Submitted,

Kenneth Edmondson

Kenneth Edmondson, Appellant

Propria Persona / Sui Juris

[Phone Number] 843) 304-3909

[Address] 397 HUNTSMAN DR GOOSECREEK SC

Date: 11/17, 2025

Sandra Jones Notary

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SC Court of Appeals

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Kenneth Edmondson,
Appellant.

Appellate Case No.: 2024-000756

Lower Court Nos.: 2020-CP10-01867 / 2021-CP10-02419

PROOF OF SERVICE

(For Appellant's Reply to Respondent's Return to Motion to Recall Remittitur)

I, **Kenneth Edmondson**, hereby certify that I served a true and correct copy of:

"APPELLANT'S MOTION OF EXTENSION TO REPLY TO RESPONDENT'S RETURN TO MOTION TO RECALL REMITTITUR"

Upon the following parties **by Certified Mail and/or by hand-delivery**, pursuant to Rule 262, SCACR:

1. W. Jamison Cox, Esq.

Smith, Cox & Associates, LLP
160 East Bay Street, Suite 201
P.O. Box 20458
Charleston, SC 29413
Phone: (843) 853-5577
.Attorney for Respondent TDS of Charleston, LLC

2. The Honorable Mikell R. Scarborough

Master-in-Equity, Charleston County
100 Broad Street, Suite 266
Charleston, SC 29401

3. Charleston County Clerk of Court – Common Pleas Division

100 Broad Street, Suite 143
Charleston, SC 29401

4. TDS of Charleston, LLC

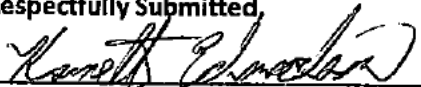
P.O. Box 248
Mount Pleasant, SC 29465

5. South Carolina Court of Appeals – Clerk of Court

1220 Senate Street
Columbia, SC 29201
Phone: (803) 734-1890
Fax: (803) 734-1839

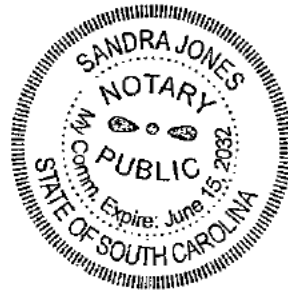
Service was completed on this the 17 day of NOVEMBER, 2025.

Respectfully Submitted,



Kenneth Edmondson, Appellant

Proceeding in Propria Persona, Sui Juris
All Rights Reserved, Without Prejudice
[843 853-5577]



ACKNOWLEDGMENT

State of South Carolina

County of Charleston

On this 17th day of November, 2025, before me personally appeared **Kenneth Edmondson**, known to me (or satisfactorily proven) to be the person whose name is subscribed to this instrument, and acknowledged that he executed the same for the purposes therein contained.



Notary Public for South Carolina

My Commission Expires: 06/15/2032

Kenneth Edmondson
Kenneth Edmondson
337 HUNTSMAN DR
GOOSE CREEK SC 29445-2744



CHARLESTON SC 29401

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NOV 20 2025

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SC Court of Appeals

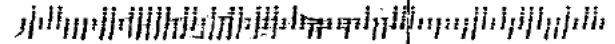


Appellant Court Rule

1231 GERVAIS ST

COLUMBIA SC 29201-3206

29201-32063



Part # 156297-435 RRDW2 EXP 08/26



Mr. Kenneth J. Edmondson
337 Huntsman Dr.
Goose Creek, SC 29445-2744

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Appellant Court Rule
1231 Gervais Street
Columbia, S.C. 29201

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S.C. SUPREME COURT