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Dec 01 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

CHRISTOPHER JONES,

Appellant,

v.

Appellate Case No. 2024-000731

D&B REAL ESTATE VENTURES, LLC,
DARIUS JONES, and
BRADLEY ROBINSON,

Respondents.

**APPELLANT'S MOTION FOR EXTENSION OF
TIME TO CORRECT DEFICIENCIES IN RECORD ON APPEAL**

Appellant Christopher Jones ("Appellant"), appearing pro se, respectfully moves this Honorable Court for an extension of time to correct the deficiencies identified in the Court's letter dated November 10, 2025. In support of this Motion, Appellant respectfully shows the Court as follows:

PROCEDURAL BACKGROUND

1. On November 10, 2025, the Clerk of the Court of Appeals sent Appellant a letter identifying deficiencies in the Record on Appeal and requiring correction within ten (10) days or the matter would be dismissed.
2. The November 10, 2025 letter states that this is the Court's second request for these corrections.
3. The deficiencies identified are:
 - a. Proof of service not in compliance with SCACR Form 7;
 - b. Record on appeal lacks an index listing all documents and page numbers per Rule 210(c), SCACR;
 - c. Record on appeal is improperly paginated per Rule 210(c), SCACR;
 - d. Cover of record on appeal does not contain required information per Rule 267(a), SCACR;and

e. Amended appellant's final brief filed October 15, 2025 requires a motion to amend pursuant to Rule 240, SCACR.

4. Appellant received the November 10, 2025 letter on or about November 14, 2025, leaving approximately six (6) days remaining under the Court's ten-day deadline.

5. Appellant is proceeding pro se and is simultaneously managing multiple complex legal matters, including active litigation in Mississippi federal court.

GOOD CAUSE FOR EXTENSION

6. Appellant respectfully submits that good cause exists for an extension of time to correct the identified deficiencies for the following reasons:

a. Appellant is proceeding pro se without the benefit of legal counsel and is unfamiliar with the technical formatting requirements of the SCACR;

b. The deficiencies require substantial work including: creating a compliant index, repaginating the entire Record on Appeal consecutively, reformatting the cover page, preparing proper proof of service, and filing a motion to amend the brief;

c. Appellant is diligently working to comply with all Court requirements but needs adequate time to ensure full compliance given the technical nature of the corrections;

d.. Ten days is insufficient time for a pro se litigant to properly complete all required corrections, particularly given the need to review the SCACR, study the required forms, and implement all technical requirements correctly;

e. This extension will not prejudice the Respondents, as it relates solely to correcting technical deficiencies in the Record on Appeal, not to substantive briefing deadlines;

f. Appellant is committed to full compliance with all SCACR requirements and requests additional time only to ensure that all corrections are done properly and completely; and

g. A thirty-day extension will allow Appellant to methodically address each deficiency in accordance with the SCACR and avoid the risk of submitting corrections that are again incomplete or non-compliant.

PROPOSED TIMELINE

7. If this Motion is granted, Appellant proposes the following timeline:

a. File corrected Record on Appeal with proper index, pagination, cover, and proof of service: within thirty (30) days of this Court's Order granting extension;

b. File Motion to Amend Appellant's Final Brief (if Appellant elects to proceed with the amended brief filed October 15, 2025): within thirty (30) days of this Court's Order granting extension.

COMMITMENT TO COMPLIANCE

8. Appellant acknowledges that this is the Court's second request for these corrections and assures the Court of his commitment to full and complete compliance with all SCACR requirements.

9. Appellant will use the requested extension to carefully review all applicable rules, study the required forms, and ensure that all corrections fully satisfy the Court's requirements.

10. Appellant understands the seriousness of the Court's directive and will prioritize completion of these corrections during the extension period.

CONCLUSION

11. For the reasons set forth above, Appellant respectfully requests that this Honorable Court grant an extension of thirty (30) days from the date of the Court's Order to correct all identified deficiencies in the Record on Appeal.

12. In the alternative, if the Court is not inclined to grant a thirty (30) day extension, Appellant respectfully requests such shorter extension as the Court deems appropriate under the circumstances.

WHEREFORE, Appellant Christopher Jones respectfully requests that this Honorable Court:

A. Grant an extension of time of thirty (30) days to correct all deficiencies identified in the Court's November 10, 2025 letter;

B. In the alternative, grant such extension of time as the Court deems just and proper under the circumstances; and

C. Grant such other and further relief as the Court deems just and equitable.

Respectfully submitted this 26th day of November, 2025.

s/ Christopher Jones
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Appellant

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November, 2025, I served a copy of the foregoing Motion for Extension of Time to Correct Deficiencies in Record on Appeal upon Respondents' counsel by depositing the same in the United States Mail, postage prepaid, and by email, addressed as follows:

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