

January 2, 2026

Via U.S. Mail and Email

The Honorable Jenny Abbot Kitchings  
Clerk of Court  
SC Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
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RECEIVED  
Jan 02 2026  
SC Court of Appeals

**RE: Christopher Jones v.  
D&B Real Estate Ventures, LLC; Darius Jones; Bradley Robinson  
Circuit Court Case No.: 2024-CP-23-00312  
Appellate Case No.: 2024-00417**

Dear Ms. Kitchings,

Respondents respectfully submit this letter in response to Appellant's December 17, 2025 filings, including the "Motion for Leave to File Response to Respondent's Motion for Dismissal Out of Time" and the accompanying "Response in Opposition to Motion for Dismissal." These filings continue a pattern of procedural noncompliance, misrepresentation, and disregard for this Court's rules and orders.

As set forth in Respondents' pending Motion to Dismiss, Appellant has repeatedly failed to comply with the South Carolina Appellate Court Rules (SCACR) and with the deadlines and instructions expressly provided by this Court. Despite multiple deficiency notices, Appellant has yet to submit a corrected Record on Appeal, which remains a necessary predicate for meaningful appellate review.

While Appellant now asserts that all deadlines were "held in abeyance," there is no order or legal authority to support such a belief, nor did he seek clarification from the Court before allowing further deadlines to lapse. Compounding this, Appellant simultaneously criticizes Respondents for not filing a final brief, an argument that directly contradicts his claim that the appellate timeline was suspended. If deadlines were truly "in abeyance," then Respondents would have had no obligation to act. That said, Respondents' brief deadline has not been triggered because Appellant never corrected and served the Record on Appeal, a procedural prerequisite under SCACR. His attempt to blame Respondents while ignoring his own failures only underscores the disingenuous nature of his filings.

Appellant's filings repeatedly cite inapplicable authorities, including, but not limited to, Rule 246, SCACR, which applies solely to criminal appeals, and *Dawkins v. Dawkins*, 386 S.C. 169, 687 S.E.2d 52 (2010), a family court case. These citations have no bearing on the procedural issues before the Court. Their inclusion, along with the generic tone and formulaic structure of



Appellant's submissions, strongly suggests the use of generative AI tools without any meaningful legal review.

These tools can generate formatted pleadings almost instantaneously, but they cannot substitute for legal analysis, sound judgment, or even basic diligence. At a minimum, a litigant, pro se or otherwise, must ensure that the authorities cited are real, relevant, and accurately applied. While use of generative tools is not inherently improper, in an era where such verification can be readily performed using standard legal research tools, Appellant's repeated reliance on inapplicable or misquoted authority demonstrates a failure to engage in even the most elementary review before filing with one of South Carolina's highest courts.

Despite relying on tools that can produce complete pleadings in minutes, Appellant continues to request extension after extension, attributing his delays to hardship and complexity. This disconnect, between the speed and simplicity of his filing method and his persistent claims of delay, undermines any assertion of confusion or good-faith effort. It is not the time required to prepare filings that has hindered Appellant, but his unwillingness to verify even the most basic legal content before submission.

While pro se litigants may be afforded some additional grace, they are nonetheless bound by the same procedural and substantive standards as licensed attorneys. Self-representation is not a shield from compliance with appellate rules, nor does it grant license to submit inaccurate or inapplicable legal citations, particularly when such errors could have been avoided through even minimal verification prior to filing.

These circumstances reflect not the struggles of an inexperienced litigant, but a strategic misuse of the appellate process, marked by a persistent refusal to meet core obligations, an expectation of limitless accommodation, and a fundamental lack of respect for the seriousness of appellate litigation and the professional standards it requires.

Despite multiple warnings from this Court that continued noncompliance would result in dismissal, Appellant has demonstrated ongoing disregard for the South Carolina Appellate Court Rules. His conduct has placed unnecessary burdens on both Respondents and the judiciary. At this stage, it cannot be excused as oversight or inexperience, it constitutes an abuse of process that should not be allowed to continue.

For these reasons, Respondents respectfully request that the Court deny Appellant's "Motion for Leave to File Response to Respondent's Motion for Dismissal Out of Time," disregard the accompanying "Response in Opposition to Motion for Dismissal" and grant Respondents' pending Motion to Dismiss. Respondent also requests such other and further relief as the Court deems just and appropriate, including clarification that no further filings will be accepted absent full compliance with SCACR and this Court's prior Orders.


Lastly, Respondents respectfully take this opportunity to clarify that the citation to "Rule 227(c), SCACR" in the introductory paragraph of the November 24, 2025 Motion to Dismiss was a scrivener's error. The correct authority is Rule 260(a), SCACR, as accurately cited and quoted throughout the body of the motion.

We apologize for any confusion and appreciate the Court's consideration.



Respectfully,

**HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC**

A handwritten signature in blue ink, appearing to read 'R. Heidari', written over a horizontal line. The signature is fluid and cursive.

**Ra'na Heidari, Esq.**

RXH/mas

cc: