

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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Jan 28 2026

SC Court of Appeals

James M. Harley,
Appellant,

v.

South Carolina Department of Employment and Workforce;
Bradshaw Automotive Group, Inc.,
Respondents.

Appellate Case No.: 2024-001795

**I. SUPPLEMENTAL REPLY TO RESPONDENTS’
MOTION TO DISMISS**

Appellant, **James M. Harley**, appearing **pro se**, respectfully submits this Supplemental Reply solely to advise the Court of the filing of a **Medical Statement Update**, which will be submitted **under seal if the relevant motion is granted**.

A. Medical Statement Update Filed Under Seal

Since the filing of Appellant’s prior submissions, Appellant has finalized the scheduling of the surgical procedure previously referenced in his consolidated motion.

The surgery originally scheduled for **January 26, 2026**, was **canceled due to an ice storm** and related conditions beyond Appellant’s control. The procedure has now been **rescheduled as of yesterday Pfor February 9, 2026**. A Medical Statement Update reflecting this change will be filed **under seal** to protect Appellant’s confidential medical information if the relevant motion is granted.

This supplemental filing serves only to ensure the accuracy and completeness of the record before the Court. It does not expand the relief requested.

B. Good Cause and Lack of Prejudice

The updated medical information further confirms the existence of **good cause** for the limited, temporary relief sought. The requested stay remains finite, authorized by rule, and tied to objective medical circumstances.

Respondents suffer no prejudice from this update.

C. Respondents' Motion to Dismiss Remains Without Merit

This supplemental filing does not alter the deficiencies in Respondents' Motion to Dismiss. As previously stated, Rule 210(c), SCACR authorizes curative relief, and dismissal remains unwarranted where record deficiencies are correctable.

Conclusion

Appellant submits this Supplemental Reply solely to notify the Court of the sealed Medical Statement Update and the rescheduled surgery date. For the reasons previously stated, Respondents' Motion to Dismiss should be **denied**, and the limited relief requested should be **granted**.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Harley', with a large, stylized loop at the beginning and a long, sweeping tail.

James M. Harley
Appellant, Pro Se
238 Woods Road
Greer, SC 29650
(864) 567-7661

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II. MOTION TO FILE MEDICAL STATEMENT UPDATE UNDER SEAL

Appellant, **James M. Harley**, appearing **pro se**, respectfully moves this Court for leave to file a **Medical Statement Update under seal**.

In support of this Motion, Appellant states:

1. The Medical Statement Update contains confidential personal health information relating to Appellant's medical condition and scheduled surgical procedure.
2. Public disclosure of this information would unnecessarily invade Appellant's privacy and is not required for Respondents' substantive review of the appellate issues.
3. The sealed filing is narrowly tailored and submitted solely to establish good cause for limited procedural relief already requested.
4. Filing the document under seal protects Appellant's privacy while ensuring the Court has accurate and complete information relevant to pending motions.

WHEREFORE, Appellant respectfully requests that the Court permit the Medical Statement Update to be filed **under seal**, and grant such other relief as the Court deems just and proper.

Respectfully submitted,



James M. Harley
Appellant, Pro Se
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[SEALED] MEDICAL STATEMENT UPDATE TO BE SUBMITTED ONCE GRANTED

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III. CERTIFICATE OF SERVICE

I certify that on January 28th, 2026, I served a true and correct copy of the following documents:

- Supplemental Reply to Respondents' Motion to Dismiss, and
- Motion to File Medical Statement Update Under Seal

on the following counsel of record by **U.S. Mail**:

Valerie M. McMellan, Esquire

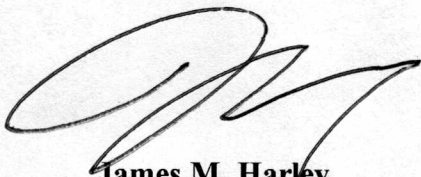
South Carolina Department of Employment and Workforce
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Date: January 28th, 2026

Respectfully submitted,



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