

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF APPEALS

Joseph Jaco and Lauren Jaco)
 Respondents)
 Vs.)
 J.N. Green and Associates , LLC,)
 Big Blue Express LLC and Joe Green)
 Appellants)

Case No. 2024-000679
MOTION TO REINSTATE APPEAL

COMES NOW the Appellants, by and through undersigned counsel, and respectfully move this Honorable Court for an Order reinstating the above-captioned appeal, which was dismissed by Order dated March 3, 2026, for failure to timely file the Record on Appeal. In support of this Motion, Appellants show the Court as follows:

1.

This appeal was dismissed by Order of this Court dated March 3, 2026, due to Appellants' failure to timely submit the Record on Appeal.

2.

Appellants respectfully submit that the delay in filing the Record on Appeal was the result of unforeseen and compounding logistical and technical difficulties encountered during preparation of the Record, and not the result of willful neglect or disregard of this Court's rules.

3.

Specifically, Appellants encountered continued and unanticipated issues in obtaining and confirming all necessary designated materials for inclusion in the Record on Appeal, requiring additional time to ensure accuracy and completeness.

4.

Additionally, Appellants experienced repeated technical complications involving corrupted electronic files, which required reconstruction and verification of portions of the Record.

5.

Further, unanticipated delays arose during final preparation of the Record with the print vendor, including complications associated with multiple overlapping print orders and processing errors, which contributed to the delay despite diligent efforts.

6.

These issues have now been resolved. The Record on Appeal has been fully completed and is being filed and served contemporaneously with this Motion via hand delivery.

7.

Reinstatement of this appeal will not result in undue prejudice to the Respondents. The parties have already completed initial briefing, and the Record on Appeal is now available such that the appeal may proceed without further delay.

8.

Additionally, upon information and belief, the remittitur has not yet been issued in this matter. Accordingly, this Court retains jurisdiction to reinstate the appeal, and reinstatement at this stage will not disrupt any final disposition.

9.

South Carolina appellate courts favor resolution of cases on their merits. Given that the Record on Appeal is now complete and the case is in a posture to proceed immediately, reinstatement serves the interests of justice and judicial efficiency.

WHEREFORE, Appellants respectfully request that this Honorable Court:

1. Reinstate the appeal;
2. Accept the Record on Appeal as filed contemporaneously with this Motion; and
3. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

TURNER LAW, LLC

By: /s/ Adrienne L. Turner

Adrienne L. Turner, Esquire

South Carolina Bar No.: 6840

887 Pine Log Ford Road

Travelers Rest, South Carolina 29690

Attorney for Appellants

Dated: March 17, 2026

RECEIVED

Mar 17 2026

SC Court of Appeals

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Reinstate Appeal was served upon counsel of record on this 17th day of March, 2026, as follows:

Via Courts electronic filing system. :

Ian T. Duncan, Esquire

Harry Alwin Dixon, Esquire

1812 Lincoln Street, Second Floor

Columbia, South Carolina 29202

Email:

ianduggan@callisontighe.com

harrydixon@callisontighe.com.

Additionally, paper copies of the Record on Appeal is being filed with the court and served on counsel for respondents contemporaneously herewith via hand-delivery and/or overnight delivery to counsel's office.

/s/ Adrienne L. Turner

Adrienne L. Turner, Esquire