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Mar 24 2026

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
COURT OF COMMON PLEAS

Judge G. D. Morgan

Case No. 2024-CP-23-00312
Appellate Case No.: 2024-000731

Christopher Jones,

Appellant,

v.

D&B Real Estate Ventures, LLC;
Darius Jones; Bradley Robinson,

Respondents.

**RESPONDENTS' RESPONSE IN OPPOSITION
TO APPELLANT'S MOTION FOR EXTENSION OF TIME**

Respondents D&B Real Estate Ventures, LLC, Darius Jones, and Bradley Robinson, by and through undersigned counsel, respectfully submit this Response in Opposition to Appellant's March 9, 2026 Motion for Extension of Time.

Appellant has repeatedly failed to comply with the South Carolina Appellate Court Rules and this Court's prior orders governing preparation of the Record on Appeal. On September 4, 2025, the Clerk issued a deficiency notice identifying defects in the Record on Appeal. Appellant was granted an extension of time to cure those deficiencies. Thereafter, on November 10, 2025, the Court issued a second deficiency notice, reflecting that Appellant's prior corrections were insufficient. Despite these notices and prior extensions, Appellant has not submitted a compliant Record on Appeal.

Appellant's present motion does not establish good cause for a further extension. The Record on Appeal remains deficient, and Appellant has already been afforded multiple opportunities to correct the deficiencies identified by the Court. Although Appellant has sought additional time to cure these deficiencies, no corrected Record on Appeal has been submitted to date. At this stage, further extensions would serve only to prolong an appeal that cannot proceed without a proper record.

Notably, Appellant seeks to continue this appeal despite the trial court's dismissal of his claims based on his undisputed lack of licensure, which precludes recovery under South Carolina law. While Appellant may pursue appellate review, his continued failure to comply with the procedural requirements necessary to advance that review, particularly after multiple deficiency notices and extensions, has resulted in unnecessary delay and has required Respondents to incur additional time and expense responding to filings that do not cure the underlying defect. These circumstances underscore the prejudice caused by continued delay and weigh against the grant of any further extension. Under these circumstances, further extension is not warranted.

This appeal has been pending since May 2024. Respondents have been required to respond to repeated filings while Appellant has failed to meet his fundamental obligation to provide a proper Record on Appeal.

Accordingly, Respondents respectfully request that this Court deny Appellant's Motion for Extension of Time and grant Respondents' pending Motion to Dismiss.

Respectfully submitted this Tuesday, March 24, 2026.

HOLDER, PADGETT, LITTLEJOHN + PRICKETT, LLC

s/ M. Stokely Holder

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Attorneys for Respondents

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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

THE HONORABLE G.D. MORGAN

Appellate Case No. 2024-00417
Circuit Court Case No. 2024-CP-23-00312

CERTIFICATE OF SERVICE

I, the undersigned attorney for the Respondents', D&B Real Estate Ventures, LLC, Darius Jones and Bradley Robinson, do hereby certify that I have served Respondents' Response in Opposition to Appellant's Motion for Extension of Time on the Appellant, Christopher Jones by sending a copy via email to intljonesc@gmail.com and via mail to 309 Perry Ave., Greenville, SC 29601. I also certify that I have served Respondents' Response in Opposition to Appellant's Motion for Extension of Time on the South Carolina Court of Appeals by depositing it in the United States Mail, postage prepaid, on March 24, 2026, addressed to The Honorable Jenny Abbott Kitchings, Clerk of Court, P.O. Box 11629, Columbia, SC 29211, and by electronic mail at: ctappfilings@sccourts.org.

s/Ra'na Heidari

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Attorneys for the Respondents D&B Real Estate Ventures, LLC, Darius Jones and Bradley Robinson

March 24, 2026

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Via U.S. Mail and Email

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
P.O. Box 11629
Columbia, SC 29211
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**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.: 2024-00731**

Dear Ms. Kitchings,

Please find enclosed herewith for service upon the court Respondents' Response in Opposition to Appellant's Motion for Extension of Time, along with a Certificate of Service for same.

Should you have any questions or concerns, feel free to contact our office.

Regards,

HOLDER PADGETT LITTLEJOHN + PRICKETT, LLC



Carolyn Denney
Paralegal

Enclosures

cc: Christopher Jones