

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.: 2023-001227

RECEIVED

Apr 06 2026

SC Court of Appeals

Christopher Jones,

Appellant,

v.

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

Respondents.

RESPONDENTS' MOTION TO ALLOW LATE FILING OF RETURN

Respondents D&B Real Estate Ventures, LLC, Darius Jones, and Bradley Robinson, by and through undersigned counsel, respectfully move this Court for leave to allow the late filing of their Response in Opposition to Appellant's Motion for Extension of Time, and would show as follows:

1. Appellant filed a Motion for Extension of Time on or about March 9, 2026.
2. Respondents thereafter submitted a Response in Opposition to Appellant's Motion for Extension of Time.
3. The Court has notified Respondents that the Response was filed outside the time period prescribed by the South Carolina Appellate Court Rules.
4. Respondents' filing was not the result of bad faith, but occurred in the context of ongoing procedural issues in this appeal and while evaluating whether a response was necessary under the circumstances.

5. The Response is brief, does not prejudice Appellant, and may assist the Court in resolving the pending motion and addressing the procedural posture of this case.

WHEREFORE, Respondents respectfully request that this Court allow the late filing of their Response in Opposition to Appellant's Motion for Extension of Time and grant such other and further relief as the Court deems just and proper.

Respectfully submitted this 6th day of April, 2026.

HOLDER, PADGETT, LITTLEJOHN + PRICKETT, LLC

s/M. Stokely Holder
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SC Court of Appeals

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. 2024-000731
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' Motion to Allow Late Filing of Return and 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' Motion to Allow Late Filing of Return and 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

April 6, 2026

Carolyn G. Denney

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April 6, 2026

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
ctappfilings@sccourts.org

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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.: 2024-00731

Dear Ms. Kitchings,

Please find enclosed herewith for service upon the court Respondents' Motion to Allow Late Filing of Return and Respondents' Response in Opposition to Appellant's Motion for Extension of Time, along with a Certificate of Service for same. I have also included our firm's check in the amount of \$50.00 for the filing fee.

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*