

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

JOEY C. REID,
APPELLANT

- v -

DENNIS KELLY
OF THE GREENWOOD DETENTION CENTER,
RESPONDENT

CASE No. : 2026 - 000968

MOTION FOR ENLARGEMENT
OF
TIME

RECEIVED

APR 29 2026

SC Court of Appeals

ON APRIL 3, 2026, THE APPELLANT, JOEY C. REID - APPEARING PRO SE - DID
SUBMIT A "NOTICE OF APPEAL AND INCORPORATED MOTION FOR ENLARGEMENT OF TIME" TO THIS
HONORABLE COURT, CONCERNING AN APPEAL FROM THE COURT OF COMMON PLEAS, CASE NUMBER:
2023-CP-24-00259.

ON APRIL 24, 2026, APPELLANT RECEIVED CORRESPONDENCE FROM SOUTH CAROLINA
COURT OF APPEALS DEPUTY CLERK, CATHERINE HARRISON, DATED APRIL 21, 2026, INSTRUCTING
APPELLANT TO CORRECT THE FOLLOWING DEFICIENCY:

"THE NOTICE OF APPEAL AND THE MOTION FOR
ENLARGEMENT OF TIME MUST BE TWO SEPARATE DOCUMENTS."

THE APPELLANT HAS SINCE SUBMITTED A SEPARATE NOTICE OF APPEAL, AND DOES HEREBY
SUBMIT THE INSTANT MOTION FOR ENLARGEMENT OF TIME - AS IT RELATES TO THE TIMEFRAME
SPECIFIC FOR SUBMITTING NOTICE OF APPEAL - SEPARATELY.

THE APPELLANT IS PROCEEDING PRO SE AND IS CURRENTLY DETAINED INSIDE THE
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS, AT KIRKLAND RICE CENTER, WHERE HE IS ASSIGNED "INTAKE
STATUS." APPELLANT ARRIVED ON OR ABOUT FEBRUARY 11, 2026. DURING INTAKE - WHICH TYPICALLY LASTS
BETWEEN 100-120 DAYS, DETAINEES ARE RESTRICTED FROM OBTAINING ACCESS TO LEGAL SUPPLIES (E.G.
PAPER, PENCIL, ENVELOPES), LEGAL MATERIALS AND LEGAL RESEARCH DOCUMENTS. DUE TO SUCH
RESTRICTIONS, APPELLANT'S DUE PROCESS AND PROCEDURAL ACCESS TO THE COURT WAS CURTAILED.

AS A RESULT OF THIS CURTAILMENT, THE APPELLANT WAS INITIALLY PREVENTED
FROM SUFFICIENTLY SUBMITTING HIS NOTICE OF APPEAL, DUE TO THE EXTENUATING CIRCUMSTANCES -
AS NO DIRECT FAULT OF HIS OWN. THE APPELLANT DIRECTS THE COURT'S ATTENTION TO "EXHIBIT A"
FROM THE ORIGINAL "NOTICE OF APPEAL AND INCORPORATED ENLARGEMENT OF TIME" AND APPELLANT
REQUESTS THE EXHIBIT / DOCUMENT "SCDC FORM 19-11 REQUEST TO STAFF MEMBER" BE INCLUDED
WITH THE INSTANT MOTION FOR ENLARGEMENT OF TIME.

APRIL 24, 2026
COLUMBIA, SOUTH CAROLINA

RESPECTFULLY SUBMITTED,

S/ Joey C. Reid

JOEY C. REID

APPELLANT (PLAINTIFF)

v.

DENNIS KELLY OF THE GREENWOOD DETENTION CENTER

RESPONDENT (DEFENDANT)

CASE NUMBER: 2026-000968

NOTICE OF APPEAL

THE PLAINTIFF, JOEY C. REID, DOES HEREBY SUBMIT THIS NOTICE OF APPEAL IN REGARD TO C/A No.: 2023-CP-24-00259. ON OR ABOUT FEBRUARY 3, 2026 - WHILE AT THE GREENWOOD DETENTION CENTER, THE PLAINTIFF RECEIVED AND ORDER GRANTING SUMMARY JUDGEMENT FROM THE COURT OF COMMON PLEAS, ISSUED BY THE HONORABLE JUDGE PATRICK C. FANT, III. SUBSEQUENTLY, THE PLAINTIFF WAS TRANSFERRED TO CUSTODY OF THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS ON OR ABOUT FEBRUARY 11, 2026. DUE TO AGENCY RESTRICTIONS THAT PREVENT "INTAKE STATUS" INMATES FROM ACCESS TO THE LAW LIBRARY AND LEGAL MATERIALS, THE PLAINTIFF'S INITIAL NOTICE OF APPEAL AND INCORPORATED MOTION FOR ENLARGEMENT OF TIME WAS ORIGINALLY FILED ON APRIL 3, 2026 AND THE APPELLANT WAS INSTRUCTED TO CORRECT DEFICIENCIES BY WAY OF THE INSTANT NOTICE OF APPEAL.

ASSIGNMENT OF ERROR

- 1) APPELLANT ASSIGNS THE FIRST ERROR WITHIN THE ORDER GRANTING SUMMARY JUDGEMENT, AS THE DECLARATION THAT APPELLANT'S CLAIM WAS "TIME-BARRIED."
- 2) APPELLANT ASSIGNS THE SECOND ERROR WITHIN THE ORDER GRANTING SUMMARY JUDGEMENT, AS THE DECLARATION THAT "PROBABLE-CAUSE BARS THE PLAINTIFF'S CLAIM."

DISCUSSION

PLAINTIFF'S COMPLAINT, ON ITS FACE, DECLARES THERE IS A GENUINE DISPUTE AS TO WHETHER A TIME-BAR TRULY EXISTS. PLAINTIFF'S INJURY DID NOT OCCUR UNTIL APRIL 21, 2021 AND THE COMPLAINT WAS FILED WITHIN TWO YEARS OF INJURY ON MARCH 21, 2023 - PURSUANT TO PROVISION OF THE S.C. TORT CLAIMS ACT.

ADDITIONALLY, THERE IS A GENUINE DISPUTE AS TO WHETHER PROBABLE CAUSE ACTUALLY EXISTED - WHICH IS A QUESTION OF FACT THAT SHOULD BE PRESENTED TO THE JURY FOR RESOLUTION. A MAGISTRATE'S ISSUANCE OF WARRANT, NOR INDICTMENT, ARE SUFFICIENT - IN AND OF THEMSELVES - TO SATISFY OR ESTABLISH ALL LAWFUL REQUIREMENTS OF PROBABLE CAUSE. AS THIS CONTENTIOUS ISSUE IS A MATTER OF LEGITIMATE DISPUTE, IT SHOULD BE VIEWED IN A LIGHT MOST FAVORABLE TO THE PLAINTIFF - SUCH REQUIREMENT NECESSITATES THIS QUESTION OF FACT TO BE RESOLVED BY JURY.

CONCLUSION

BASED UPON THE ABOVE - STATED FACTORS, THE PLAINTIFF HEREBY SUBMITS THIS NOTICE OF APPEAL.

APRIL 24, 2026
COLUMBIA, SOUTH CAROLINA

RESPECTFULLY SUBMITTED,

5/ Joey C. Reid

Mr. John C. Reid # 288142

KIRKLAND R/E CENTER A1/B-43

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COLUMBIA, SOUTH CAROLINA



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Ms. Jenny Abbott Kitchings, Clerk

SOUTH CAROLINA COURT OF APPEALS

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