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May 01 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
The Honorable Courtney Clyburn Pope
Circuit Court Judge

Appellate Case No. 2025-000808
Circuit Court Case No. 2023-CP-10-02263

Jeronimo Hernandez Jiminez.....Appellant,

v.

Rolando Medrano.....Respondent.

APPELLANT’S RESPONSE TO
RESPONDENT’S MOTION TO STRIKE APPELLANT’S DESIGNATION OF MATTER TO
BE INCLUDED IN THE RECORD ON APPEAL AND PORTIONS OF THE INITIAL
APPELLANT’S BRIEF AND TO STAY DEADLINE FOR FILING OF THE RESPONDENT’S
INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD
ON APPEAL

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Attorneys for Appellant

May 1, 2026

The Appellant, Jeronimo Hernandez Jiminez, in receipt of Respondent's Motion to Strike, would respond as follows:

The Appellant would submit that Respondent's Motion to Stay his deadline for the filing of Respondent's Initial Brief is improper as it was filed one day before his brief was due. Pursuant to Rule 240(b) SCACR, "the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition." As of the date of Appellant's response to Respondent's Motion, this Court has not granted a stay of the time limit for Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal. Respondent has, accordingly, failed to timely submit an initial brief.

While the Appellant concedes that only materials presented to the circuit court should be included in the Designation of Matter to be Included in the Record on Appeal pursuant to Rule 210(c), the Appellant would represent that the substance and text of Appellant's initial brief is not objectionable under the SCACR. No part of the text of Appellant's initial brief should be stricken because the text is, and can be, supported by references to other materials presented to the circuit court. Respondent is free to argue that the contentions in Appellant's Brief are not supported by the record. Therefore, should this Court grant Respondent leave to submit his initial brief, the Appellant would respectfully request an order granting the Appellant 10 days to amend his Designation of Matter, and to revise citations in his Initial Brief.

[signature page to follow]

LAW OFFICE OF
DARRELL THOMAS JOHNSON, JR., LLC

By: s/Joshua R. Fester

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Appellate Case No. 2025-000808
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Jeronimo Hernandez Jimenez,Appellant,

v.

Rolando Medrano,.....Respondents.

I hereby certify that on the 1st day of May, 2026, I served a true and accurate copy of the foregoing APPELLANT’S RESPONSE TO RESPONDENT’S MOTION TO STRIKE APPELLANT’S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL AND PORTIONS OF THE INITIAL APPELLANT’S BRIEF AND TO STAY DEADLINE FOR FILING OF THE RESPONDENT’S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL, on the parties listed below via email and/or by placing the same in the United States mail, first class and/or Certified postage attached, and addressed to the following:

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s/Joshua R. Fester

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May 1, 2026

Via email to ctappfilings@sccourts.org

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Jeronimo Hernandez Jimenez v. Rolando Medrano
Appellate Case No: 2025-000808
Our File No: 08-1146-01-200-23

Dear Ms. Kitchings:

Please find attached for filing, Appellant's Response to Respondent's Motion to Strike Appellant's Designation of Matter to be Included in the Record on Appeal and Portions of the Initial Appellant's Brief and to Stay Deadline for Filing of the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter.

Please file the documents and return a stamped copy to us.

Thanking you in advance for your assistance,

Very truly yours,

Joshua R. Fester
Joshua R. Fester, Esquire

Enclosures

cc: Via email only to Thomas A. Bendle, Jr., Esquire
Via email only to Payton Dwight Hoover, Esquire
Via email only to Carmen V. Ganjehsani, Esquire