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**May 05 2026**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE COURTNEY CLYBURN POPE  
CIRCUIT COURT JUDGE

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APPELLATE CASE NO. 2025-000808  
CIVIL ACTION NO. 2023-CP-10-02263

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Jeronimo Hernandez Jimenez,

**APPELLANT,**

versus

Rolando Medrano,

**RESPONDENT.**

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**REPLY TO THE RESPONSE TO THE  
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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In his Response to Respondent Rolando Medrano's motion to strike certain designated matters from the Designation of Matter to be Included in the Record on Appeal as well as those portions of the Initial Appellant's Brief which rely upon matters not presented to the circuit court, Appellant Jeronimo Hernandez Jimenez does not contest that he designated matters which were not presented to the lower court or tribunal. Therefore, the Court should require Appellant to remove from his Designations

the materials not presented to and considered by the circuit court. See Rule 210(c), SCACR.

Appellant instead argues that Respondent has failed to timely submit his brief because under Rule 240(b), SCACR, “. . . the time limits imposed by these Rules shall not be stayed by the filing of a motion or petition.” Rule 240(b) also provides, however, that the time limits will not be stayed unless “ordered by the appellate court.” In his motion, Respondent moved for a stay of his deadline to file his Initial Respondent’s Brief and Designations in conjunction with the motion to strike until thirty (30) days after the receipt of a corrected Initial Appellant’s Brief and Designation of Material to be Included in the Record on Appeal from Appellant. Under Rule 240(b), this Court may stay and extend the deadline for the filing of Respondent’s Initial Brief and Designations until such time that Appellant complies with Rule 210(c), SCACR.

In addition, Appellant asks the Court that he not be required to strike the text of his Initial Appellant’s Brief. Respondent does not object if Appellant can cite to materials that were presented to the circuit court to support the statements in the brief. But Appellant cannot include cites to materials not presented to the circuit court to support the statements made in his brief (including references to the November 17, 2020 deposition of Rolando Medrano on pages 2, 3, and 5 of the brief).

Accordingly, for the reasons set forth herein and in the previously filed Motion, Respondent requests the Court to order Appellant to strike designated materials not presented to the circuit court, to strike references in the Initial Appellant’s Brief to materials not presented to the circuit court, and to stay the deadline for the filing of Respondent’s Initial Brief and Designations until thirty (30) days after receipt of the

corrected Initial Appellant's Brief and Designation of Matter to be Included in the Record on Appeal.

Respectfully submitted,

/s Carmen V. Ganjehsani  
Carmen V. Ganjehsani (S.C. Bar No. 73515)  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)

Payton D. Hoover  
(S.C. Bar No. 75967)  
RICHARDSON, PLOWDEN & ROBINSON, PA  
235 Magrath Darby Blvd., Suite 100  
Mt. Pleasant, South Carolina 29413  
(843) 805-6550  
[phoover@richardsonplowden.com](mailto:phoover@richardsonplowden.com)

Thomas Allan Bendle, Jr.  
(S.C. Bar No. 69561)  
HOWELL GIBSON & HUGHES, PA  
PO Box 40  
Beaufort, SC 29901  
(843) 522-2400  
[tbendle@hgpha.com](mailto:tbendle@hgpha.com)  
**Attorneys for Respondent**  
**Rolando Medrano**

May 5, 2026

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**CERTIFICATE OF SERVICE**

**SC Court of Appeals**

I, the undersigned, attorney for Respondent, Rolando Medrano, do hereby certify that I have this date served the foregoing Reply to the Response to the 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, dated April 21, 2026, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Joshua Reece Fester  
Warren Paul Johnson  
Darrell T. Johnson, Jr.  
LAW OFFICE OF DARRELL THOMAS JOHNSON, JR.  
300 Main Street  
PO Box 1125  
Hardeeville, SC 29927  
[jfester@johnsonslawoffice.com](mailto:jfester@johnsonslawoffice.com)  
[wpj@johnsonslawoffice.com](mailto:wpj@johnsonslawoffice.com)  
[filing@johnsonslawoffice.com](mailto:filing@johnsonslawoffice.com)  
**Attorneys for Appellant**

A copy of the sent email is enclosed with this Certificate of Service.

/s Carmen V. Ganjehsani  
Carmen V. Ganjehsani  
S.C. Bar No. 73515  
RICHARDSON, PLOWDEN & ROBINSON, PA  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**Attorneys for Respondent**  
**Rolando Medrano**

Date: May 5, 2026.

**Carmen Ganjehsani**

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**From:** Carmen Ganjehsani  
**Sent:** Tuesday, May 5, 2026 2:30 PM  
**To:** jfester@johnsonslawoffice.com; wpj@johnsonslawoffice.com; filing@johnsonslawoffice.com; Laura McKenzie  
**Cc:** Payton Hoover; Thomas A Bendle, Jr.  
**Subject:** Jimenez v. Medrano Appellate Case No. 2025-000808  
**Attachments:** 2025-000808 Jimenez v. Medrano (Reply to Response to Mtn to Strike).pdf

**SC Court of Appeals**

Please find served upon you the Reply to the 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 appeal.

Carmen Ganjehsani

<a href="#">HOME</a>	<a href="#">VCARD</a>	<a href="#">LOCATION</a>
	<b>Carmen V. Ganjehsani</b> Shareholder <a href="mailto:Cganjehsani@RichardsonPlowden.com">Cganjehsani@RichardsonPlowden.com</a>	<b>Richardson Plowden &amp; Robinson, P.A.</b> 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 <a href="http://www.RichardsonPlowden.com">www.RichardsonPlowden.com</a>

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