

THE STATE OF SOUTH CAROLINA
SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS
JOCELYN NEWMAN, CIRCUIT COURT JUDGE

RECEIVED

JUL 16 2026

SC Court of Appeals

Appellate Case No: 2026-001144

Renee Wicks, Respondent,

v.

ER Construction, LLC; OJC LLC; Richard McDaniel, individually and d/b/a ER Construction

And Kenneth L. Edwards, individually, Defendants, of which Kenneth L. Edwards is the
Appellant.

OBJECTION TO MOTION FOR EXTENSION OF TIME TO FILE INITIAL BRIEF AND
DESIGNATION OF MATTER

Appellant objects to Motion for extension of time to file initial brief and designation of
matter. Appellant continues to be unduly prejudiced by Respondent and her attorneys.

Respondent is in DEFAULT and the STATUTE OF LIMITATION ON HER ALLEGED CONTRACT
WITH HER FRAUDFEASOR EXPIRED BEFORE RESPONDENT COMMENCED HER FRIVOLOUS
LAWSUIT AGAINST APPELLANT.

RESPONDENT DOES NOT HAVE A JUSTICIABLE CASE OR CONTROVERSY RIPE FOR
ADJUDICATION AGAINST APPELLANT.

RESPONDENT DOES NOT HAVE STANDING TO SUE APPELLANT.

RESPONDENT DOES NOT HAVE ANY CONCRETE, ADVERSE ISSUES, CLAIMS, OR
DEMANDS AGAINST APPELLANT.

RESPONDENT'S COMPLAINT AGAINST THE APPELLANT IS HYPOTHETICAL, MOOT AND ABSTRACT.

RESPONDENT DOES NOT HAVE A REAL AND SUBSTANTIAL DISPUTE AGAINST APPELLANT WHICH IS APPROPRIATE FOR JUDICIAL DETERMINATION.

RESPONDENT DOES NOT HAVE ANY FACTS SUFFICIENT TO CONSTITUTE A CAUSE OF ACTION AGAINST APPELLANT.

RESPONDENT DOES NOT HAVE A LEGAL RIGHT AGAINST APPELLANT.

Appellant currently has filed copies of DESIGNATION OF MATTER.

July 16, 2026

Kenneth L. Edwards, PRO SE

P.O. Box 1563

Hollywood, S.C 29449

(843) 437-5798

S.C Bar 62877

klorenzoedwards@yahoo.com

THE STATE OF SOUTH CAROLINA
SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY
COURT OF COMMON PLEAS
JOCELYN NEWMAN, CIRCUIT COURT JUDGE

RECEIVED

JUL 16 2026

SC Court of Appeals

Appellate Case No: 2026-001144

Renee Wicks, Respondent,

v.

ER Construction, LLC; OJC LLC; Richard McDaniel, individually and d/b/a ER Construction
And Kenneth L. Edwards, individually, Defendants, of which Kenneth L. Edwards is the
Appellant.

PROOF OF SERVICE

I certify that I have served the OBJECTION TO MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF AND DESIGNATION OF MATTER on Respondent by depositing a copy of it in
the United States Mail, postage prepaid, on July 16, 2026, addressed to her attorney of
record, Jason Scott Luck, P.O. Box 47, Bennettsville, S.C 29512, by certified mail, return
receipt requested.

July 16, 2026.

Kenneth L. Edwards, PRO SE

P.O. Box 1563

Hollywood, S.C 29449

(843) 437-5798

S.C Bar 62877

klorenzoedwards@yahoo.com