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Jul 20 2026

SC Court of Appeals

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

Appellate Case No. 2024-001929

George Jenkins, Barry Heyward, Ulysses Heyward, fluorine Heyward Pickney, and Eric Ramsey, claimant from whom George Jenkins is the appellate

George S. Jenkins
Appellants,

v.

Florence Heyward-Davis,

Respondent.

**APPELLANT'S MOTION FOR EXTENSION OF TIME AND FOR LEAVE TO FILE
RESPONSE TO RESPONDENT MOTION TO DISMISS OUT OF TIME**

Appellant George S. Jenkins, appearing pro se, respectfully moves under Rules 240 and 263(b), SCACR, for leave to file his response to Respondent's Motion to Dismiss out of time and for an extension of seven (7) days from entry of the Court's order,. In support, Appellant states:

1. Respondent filed a Motion to Dismiss the appeal. The time for Appellant to file a return or response has expired. Appellant acknowledges the missed deadline and respectfully asks the Court to permit a filing out of time.

2. When Appellant received Respondent's motion, its caption listed only George S. Jenkins and Ulysses T. Heyward. Appellant had received correspondence from the Court that he understood to reflect a longer caption including additional persons or claimants. The captured that the court instructed me to put on all communication was (George Jenkins, Barry Heyward, Ulysses Heyward, fluorine, Haywood, Pickney, and Eric Ramsey, claimant's, of whom George

Jenkins is the appellee) Because Respondent's caption differed materially from the caption in the Court's correspondence and from other papers Appellant had received, Appellant was uncertain whether the motion was the official filing requiring a response. That uncertainty contributed to his delay.

3. During the same period, Appellant was attending to an emergency involving his sister, Fluorine Heyward Pinckney, who has Alzheimer's disease and other serious medical conditions. Appellant traveled between Charleston, South Carolina, and Atlanta, Georgia, to assist with her care and to put in place documents authorizing him to address her medical needs. These caregiving obligations substantially limited the time available to prepare a response.

4. The documents identified by Appellant as Affidavit A (medical and caregiving-related documents, pages 1-22), Affidavit B (emergency-room report dated July 14, 2022), and Affidavit C (South Carolina Health Care Power of Attorney and related documents) are referenced as support for the circumstances described above. Appellant will attach only the portions appropriate for filing and will comply with any applicable privacy or sealing requirements.

5. Appellant also needs time to organize documentary material needed to address factual assertions in Respondent's motion. Appellant identifies Affidavit D as records from the Charleston County Delinquent Tax Office concerning the property's tax status, including the tax payment of \$2,332.31 on August 16, 2023. The tax was paid by the appellant in order to keep the property from going into foreclosure. The later delinquent-tax proceedings and tax sale on or about November 4, 2025, was paid by family members that donated the money in order to keep the property in the family. The respondent, to the best of my knowledge did not contribute any money in order to save the property is a time when you got to say enough and related ownership

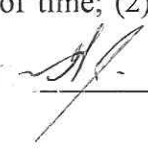
and mailing-address information. Appellant intends to cite those records in the response to the extent they support the statements made.

6. The requested extension is made in good faith and not for the purpose of delay. Appellant submits that allowing a response will permit the Court to consider both sides of Respondent's motion and the supporting documents on a more complete record. Respondent will not be unfairly prejudiced by the limited extension requested.

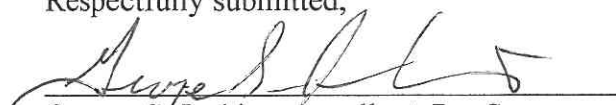
MEMORANDUM OF AUTHORITIES

Rule 240(a), SCACR, governs motions for extension of time. Rule 240(c) requires a written motion stating its grounds, proof of service, a memorandum with citation of authorities, and supporting affidavits or documents when relied-upon facts are outside the Record on Appeal or Appendix. Rule 263(b), SCACR, permits the appellate court to extend the time prescribed by the appellate rules, except the time for serving a notice of appeal. Rule 262(b), SCACR, requires proof of service with any filed document. Appellant respectfully submits that the circumstances described above constitute good cause for the requested relief.

WHEREFORE

Appellant George S. Jenkins respectfully requests that this Court (1) grant leave to file his response to Respondent's Motion to Dismiss out of time; (2) extend the filing deadline by 7 days from entry of the Court's order, ; and (3) grant such other relief as the Court deems just and proper.

Respectfully submitted,


George S. Jenkins, Appellant, Pro Se

Address: 1348 S. Sherwood Dr. , Charleston, SC 29407

telephone: 843-813-0640

email: gjen11748@aol.com

Date: July 20, 2026

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VERIFICATION OF GEORGE JENKINS

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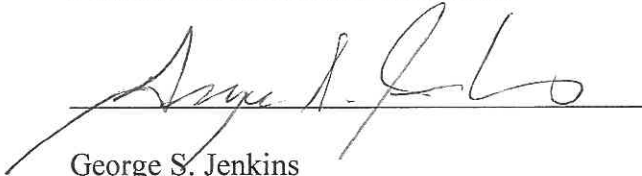
I, George S. Jenkins, being duly sworn, state as follows:

1. I am an Appellant in this matter and am competent to make this Verification.

2. I have read the foregoing Motion for Extension of Time and for Leave to File Response to Respondent's Motion to Dismiss Out of Time.

3. The factual statements in the Motion concerning my receipt of the motion, my confusion regarding its caption, my caregiving responsibilities and travel, and the documents identified as Affidavits A through D are true and correct to the best of my personal knowledge, information, and belief.

FURTHER AFFIANT SAYETH


George S. Jenkins

Date: July 20, 2024

Sworn to and subscribed before me
this _____ day of _____, 20_____.

Notary Public for _____
My Commission Expires: _____

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1. Respondent filed a Motion to Dismiss the appeal. The time for Appellant to file a return or response has expired. Appellant acknowledges the missed deadline and respectfully asks the Court to permit a filing out of time.

2. When Appellant received Respondent's motion, its caption listed only George S. Jenkins and Ulysses T. Heyward. Appellant had received correspondence from the Court that he understood to reflect a longer caption including additional persons or claimants. The captured that the court instructed me to put on all communication was (George Jenkins, Barry Heyward, Ulysses Heyward, fluorine, Haywood, Pickney, and Eric Ramsey, claimant's, of whom George

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WHEREFORE

Appellant George S. Jenkins respectfully requests that this Court (1) grant leave to file his response to Respondent's Motion to Dismiss out of time; (2) extend the filing deadline by _____ days from entry of the Court's order, or until _____; and (3) grant such other relief as the Court deems just and proper.

Respectfully submitted,

George S. Jenkins, Appellant, Pro Se

Address: 1348 S. Sherwood Dr. , Charleston, SC 29407

telephone: 843-813-0640

email: gjen11748@aol.com

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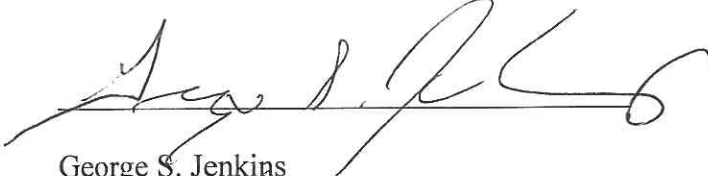
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I, George S. Jenkins, being duly sworn, state as follows:

1. I am an Appellant in this matter and am competent to make this Verification.
2. I have read the foregoing Motion for Extension of Time and for Leave to File Response to Respondent's Motion to Dismiss Out of Time.
3. The factual statements in the Motion concerning my receipt of the motion, my confusion regarding its caption, my caregiving responsibilities and travel, and the documents identified as Affidavits A through D are true and correct to the best of my personal knowledge, information, and belief.

FURTHER AFFIANT SAYETH



George S. Jenkins

Date: July 20 2026

Sworn to and subscribed before me
this 20 day of July, 2020.


Notary Public for South Carolina
My Commission Expires: 11/09/2033

