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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

74004

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Frank R. Addy, Jr. Circuit Court Judge

APPELLATE CASE NO. 2014-000091

John R. Rakowsky, Respondent
Adrian Falgione, Respondent

v.

Appellant

James Spencer,
Estate of Doris Holt,
Southern Holdings, Inc.....Plaintiffs

Of whom, James Spencer,
is.....Appellant

MOTION
FOR EXPANSION OF TIME
TO FILE INITIAL BRIEF

RECEIVED

OCT 29 2014

SC Court of Appeals

REQUEST FOR EXPANSION OF TIME TO FILE INITIAL BRIEF

Appellant James Spencer, *Pro Se*, (hereinafter "Appellant") requests an expansion of time to file his initial brief up to and including December 15, 2014, which coincides with the motion of expansion filed on October 24, 2014, by Attorney Michael Sribnick who represents the Estate of Doris Holt and Southern Holdings, Inc. in this action.

DISCUSSION

Appellant is both 100% disabled and indigent and as such has no alternative but resort to Medicaid for medical care. Medicaid suddenly and unexpectedly changed its coverage on medications prescribed to Appellant to control his diabetes. Appellant's diabetes originated from stress. The diabetes adds to the Appellant's medical disability already diagnosed at 100% by medical doctors.

The unexpected change in medications allowed under South Carolina Medicaid, to conserve costs, has resulted in a severe loss of eyesight in Appellant. The Appellant is now unable to use a computer to the extent necessary to research and complete his initial brief, as he cannot read the screen with his blurred vision. The Presbyterian Church is just one institution-seeking individuals to contribute their time so Appellant can prepare his brief and litigate this Appeal. Furthermore, Medicaid has been petitioned in the hope of restoring the effective medication to the Appellant.

- This is the first extension requested by the Appellant in this case.
- No briefs have been filed in this captioned matter before the Appellate

Court.

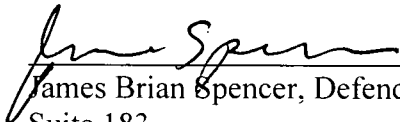
- There will be no prejudice to the Respondents by this short expansion.

CONCLUSION

THEREFORE, for the foregoing reasons the Appellant humbly moves for leave of the Appellate Court for an expansion time of forty-five (45) days up to and including December 15, 2014, for the filing of Initial Appellant Brief. This extension conforms and is consistent with the expansion currently requested on October 24, 2014 by the other parties in this action.

Respectfully submitted this 29th day of October, 2014,

By:



James Brian Spencer, Defendant, *Pro Se*
Suite 183
7001 Saint Andrews Road
Columbia, SC 29212

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2014, the document described below, was (were) served on all parties of record in this case by mailing a copy, by US mail, electronic means and or by courier.

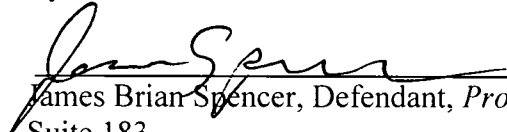
Documents served: **MOTION FOR EXPANSION OF TIME TO FILE
INITIAL BRIEF**

Parties Served:

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