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STATE OF SOUTH CAROLINA COURT OF APPEALS
FOR THE FOURTH CIRCUIT

Case # 2018-002157

Appeal From Lexington County
Common Pleas Court
Case No: 2018-CP-01385
Lexington South Carolina
Alison Renee Lee Presiding Judge

James Reese,

Appellant,

v.

Richie D. Bares

Respondent (s).

NOTICE OF MOTION
RECEIVED

SEP 06 2019
SC Court of Appeals

You are notified that on September 5, 2019 , that I, James Reese, the proper party, James Reese,not submitting to the jurisdiction of the lower court nor entering any agreement, will bring a motion to continue the procedural brief due into the court's record. This brief was originally scheduled for September__2019 and James Reese, will move the court to continue that date at least 90 (ninety) days so that the proper parties may join this cause of action to properly prepare a defense, objections, and claims to the lower court's order that has been entered for review and to show cause for the withdrawal and reversal of the lower court's decision. This application will grant adequate time to provide to the superior court pertinent and vital information pertaining to said withdrawal and reversal of the lower court's jury decisions granting the release and discharge of James Reese .

This application is based on the Notice of Motion, the Motion or Application itself, and the attached Declaration of the James Reese, . Any response to this Motion must be served no later the date of the 15th of September 2019

MOTION OR APPLICATION REQUESTING CONTINUANCE OF PLAINTIFF'S CLAIMS AND
PRELIMINARY HEARING TO ESTABLISH PROBABLE CAUSE

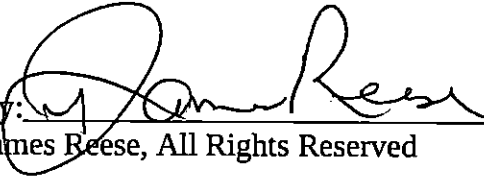
The appellant, James Reese requires the aid of this court and demands this court for an order continuing the required brief, currently scheduled for September 1st, 2019 at 8:30 a.m, to a date not less than 90 (ninety) days after September 5th, 2019. In support of the Application or Motion, the natural father and executor assert:

1. The appellant, James Reese, received the superior courts letter of brief on July 30th, 2019 at “_____”.
2. Because the proper party, James Reese, has not had adequate time due to being disabled at law, to conduct vital and proper investigations of aid in the reversal of the lower court decision, which would allow the allotted time for the court to join the proper parties to this action to complete justice by whole and not by halves.
3. Under the constitution of South Carolina union member state, the Constitution of the United States of America, and South Carolina appellant rule 402 of civil procedure, and based on the attached Memorandum of Points and Authorities and Supporting Declaration, this court has the authority to extend the time period in which the appellant James Reese executor of James Reese, estate must presents all documents supporting his claims, objections, or defenses.

WHEREFORE, the appellant James Reese private civilian and beneficiary, request that his court continue the hearing roster to a date not earlier that 90 (ninety) days after September 5, 2019, and

extend the amount of time within which James Reese, must respond and entered into the record his final brief and present proper cause for release and discharge of James Reese and the reversal of the lower court's decision.

Date: 9/5/2019

By: 
James Reese, All Rights Reserved

: Sharon Haines
1st Private Witness

Sept 5, 2019
Date

Sharon Gaines
1st Witness Name

: Josephine Denise Johnson
2nd Private Witness

9-5-2019
Date

Denise Johnson
2nd Witness Name

Form - 7

STATE OF SOUTH CAROLINA COURT OF APPEALS
FOR THE FOURTH CIRCUIT

Case NO: 2018-002157

Lexington South Carolina
South Carolina Court of Common Pleas
Alison Renee Lee, Presiding Judge
Case NO: 2016-CF-32-01385

James Reese,

Appellant,

PROOF OF SERVICES

v.

Richie D. Bares

Respondent (s).

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I James Reese, the undersigned, declares:

I served the "MEMORANDUM AND POINTS OF AUTHORITY OF CONTINUANCE,
NOTICE OF MOTION TO CONTINUE, and PROOF SERVICES on the following interested party by
hand-delivery for special deposit, a true copy thereof to:

1. MEMORANDUM OF POINTS OF AUTHORITY TO CONTINUE
2. NOTICE OF MOTION TO CONTINUE
3. PROOF OF SERVICES

Copy sent to: Richie D. Barnes
Attorney-at-law

Leopold Sarden, Jordan Law Firm, 211 Veterans Rd
Unit-D, Columbia South Carolina Zip Code 29209

Mail Number # _____

By: USPS

 James Reese 9/5/19

James Reese

All Rights Reserved. Without Recourse.

Without Prejudice.

Form 7

Proof of Service

Motion for Continuance

State of South Carolina Court of Appeals

Case No: 2018 - 002157

South Carolina Court of Common Pleas

Lexington County South Carolina

Alison Renee Lee, Presiding Judge

Case: No: 2016 – CP – 32 – 01385

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SEP 06 2019

SC Court of Appeals

Richie D. Barnes. vs. James Reese

Dear Mr. Leonard Jordan, Attorney of Jordan Law Firm, 211 Veterans Road, Columbia S.C. 29209. This is proof of service for my motion petitioning the Court of Appeals requesting continuance of my case, I am enclosing an additional copy of my request with this proof of service. Sent via USPS tracking number

Thank you for your consideration.

I am, James Reese

9/5/2019