

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas
Alison Renee Lee, Presiding Judge

Case No. 2016-CP-32-01385

Appellate Case No. 2018-002157

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SEP 12 2019
SC Court of Appeals

Richie D. Barnes,..... Respondent,

v.

James Reese,..... Appellant.

OBJECTION TO APPELLANT’S MOTION TO EXTEND TIME

Respondent hereby objects to Appellant’s Motion filed on September 6, 2019.

This appeal was filed on December 7, 2018. Since then, Appellant has requested several reprieves and extensions. In the period of nine (9) months since this appeal was filed, Appellant has not served and filed his Designation of Matter to be Included in the Record on Appeal and Appellant’s Initial Brief. Now, Appellant wants another extension, this one of “at least ninety (90) days,” effectively extending his deadline to respond to December 2019.

Other than asserting that he needs “adequate time” to perfect his appeal “due to being disabled at law” and that he wants “to join the proper parties in this action,” and “needs to have an opportunity to further conduct investigation” – all curious assertions without elaboration – he has not identified the cause of his inability to comply with the Order of this Court to file said

Designation and Brief by September 9, 2019 (other than that his home needs roof repair).

Wherefore, the Respondent prays that Appellant's Motion be denied.

Respectfully submitted,



Leonard R. Jordan, Jr., ID #3221
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Attorney for Respondent

Columbia, South Carolina
September 10, 2019

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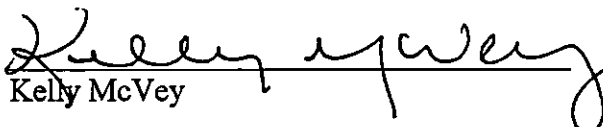
Appellate Case No. 2018-002157

CERTIFICATE OF MAILING

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I, Kelly McVey, of Jordan Law Firm, attorney for the Respondent, Richie D. Barnes, hereby certify that I have, this 10th day of September, 2019, served a copy of the attached Objection to Appellant's Motion to Extend Time upon James Reese, Appellant, by mailing a copy thereof to him, postage prepaid, to the address indicated below:

Mr. James Reese
717 Cindy Drive
Columbia, SC 29203


Kelly McVey

LEONARD R. JORDAN, JR.
TELEPHONE: (803) 726-1950
DIRECT LINE: (803) 255-0650
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September 10, 2019

The Honorable V. Claire Allen
Deputy Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Richie D. Barnes vs. James Reese; Appellate Case No.: 2018-002157

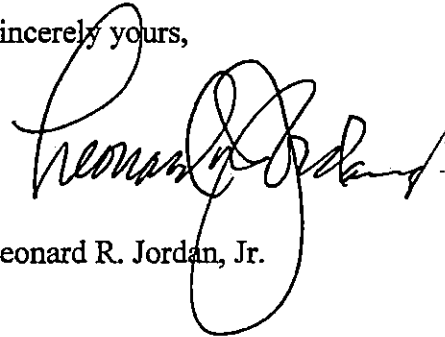
Dear Ms. Allen:

Enclosed for filing are the original and one (1) copy of an Objection to Appellant's Motion to Extend Time. I would appreciate your recording the original, and returning a clocked-copy to me in the enclosed envelope.

If you have any questions regarding this matter, please do not hesitate to contact me.

Thanking you in advance for your cooperation in this matter, I am

Sincerely yours,



Leonard R. Jordan, Jr.

LRJjr/km
Enclosure
cc: Mr. James Reese

JORDAN LAW FIRM
211 VETERANS ROAD, SUITE D
COLUMBIA, SC 29209

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SFP 12 2019

SC Court of Appeals

The Honorable V. Claire Allen
Deputy Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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