

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

Case No. 2016-CP-32-01385

Appellate Case No. 2018-002157

**RECEIVED**  
SEP 17 2019  
SC Court of Appeals

James Reese,

Appellant,

**Objection to Respondent's Objection  
To Appellant's Motion to Extend Time**

v.

Richie D. Barnes,

Respondent (s).

Appellant hereby Objects to Respondent's Objection filed the 10<sup>th</sup> day of September 2019.

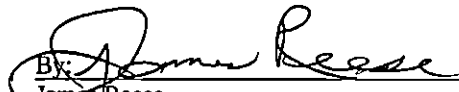
This appeal was filed on December 7, 2018, however, I, James Reese, did not receive the lower court's transcript after several failed attempts made, a total of four (4) times, to the lower court's stenographer, Steven Lablanc, until on or about June 30, 2019 via email for the cost of \$2,895.00. After receiving this transcript via email I, James Reese, paid the total cost of \$175 (one hundred and seventy-five) to print physical copies. This exorbitant amount has caused financial prejudice and has placed myself, Appellant, James Reese, in a financial disabled condition.

Due to Steven Lablanc refusal to provide to me, James Reese, the lower court's transcript in adequate time has caused an extreme delay of the preparation of my Initial Brief. Steven Lablanc refusal and delay has caused prejudice to myself, Appellant, James Reese, and has contributed significantly to wasted of the courts time. I, James Reese, need more adequate time to properly form my initial brief and without this time given will be prejudice and a rush to do justice.

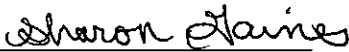
I require this court to take cognizance that I, James Reese am disabled in the rules of law and order this court to aid my with equitable relief to do justice by wholes and not by halves. I have elected to proceed in my defense in this matter per *Haines v. Kerner*, 404 U.S. 519, wherein the court has directed that those who are unschooled in law making pleadings and/or complaints shall have the court look to the substance of the pleadings rather in than the form, and hereby makes the following pleadings/notices in the above referenced matter without waiver of any other defenses or offenses. The court has directed those who are unschooled in law making pleadings shall have the court look to the substance of the pleadings rather than the form. *Pro se* pleadings are to be considered without regard to technicality; pro se litigants' pleadings are not to be held to the same high standards of perfection as lawyers. (*Maty v. Grasselli Chemical Co.*, 303 U.S. 197 (1938), *B. Platsky v. CIA*, 953 F.2d 25, 26 28 (2nd Cir. 1991)), "Court errs if court dismisses pro se litigant without instruction of how pleadings are deficient and how to repair pleadings.

Govern yourself accordingly,

Date: 9/17/19

By:   
James Reese,  
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Without Prejudice.

x Sharon Gaines 9-17-19  
1<sup>st</sup> Private Witness Full Name Date

x   
1<sup>st</sup> Private Witness Signature

x Walter Bridges Jr. 9/17/19  
2<sup>nd</sup> Private Witness Full Name Date

x   
2<sup>nd</sup> Private Witness Signature

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Appellant,

PROOF OF SERVICES

v.

Richie D. Barnes,

Respondent (s).

I James Reese, the undersigned, declares:

I served the "Objection to Respondents Objection to Appellants Motion to Extend Time and Proof of Services on the following interested party by hand-delivery and mail for special deposit, a true copy thereof to:

Copy sent to: Richie D. Barnes

Attorney-at-law

211 Veterans Rd Leonard J. Barnes  
Columbia South Carolina Zip Code 29207 unit D

Mail Number # \_\_\_\_\_

By: \_\_\_\_\_

James Reese

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Without Prejudice.

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