

THE STATE OF SOUTH CAROLINA
Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr.

Common Pleas Number: 2018-CP-07-01449
Appeal Court Number: 19-00941

RECEIVED
OCT 28 2019
SC Court of Appeals

Floyd Hargrove.....Appellant.

v.

Anthony E. Griffis, Sr.,.....Respondent.

**APPELLANT’S REPLY TO RESPONDENT’S RETURN TO APPELLANT’S
MOTION TO HOLD THE APPEAL IN ABEYANCE OR
ALTERNATIVELY FOR A SECOND EXTENSION OF TIME**

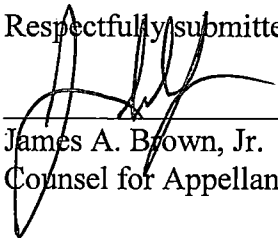
Undersigned counsel respectfully provides a brief reply to Respondent’s return. As to Respondent’s indication that undersigned is merely delaying this matter for a “heavy workload” overlooks the more personal issues involved in the first request for an extension of time. In that request, as repeated in this current request, undersigned indicated that his office was closed for the week of September 2-6 because of the Governor’s decision to order a mandatory evacuation.

However, of an even more personal issue is that undersigned’s father was hospitalized with encephalomeningitis on July 23, 2019. He was moved to in-patient hospice at the hospital (reserved for those facing imminent death) on August 3, 2019. After losing more than 70 of his 170 pounds and suffering days of seizure-like brain activity, and fevers above 103, his funeral was scheduled for August 17, 2019. Miraculously, he was late for his own funeral and began to eat after nine days of no food.

Undersigned's father has returned home but is now totally incompetent and can not speak or recognize his two sons or his wife of 51 years. His evacuation during the hurricane was a proverbial "act of god" as he was removed on a stretcher and transported in an ambulance after the evacuation began-forcing medical mandates to travel on roads closed by law enforcement. Undersigned holds the power of attorney for his father.

Thus, undersigned agrees that his workload has become complicated. Undersigned agrees that the medical concerns and hurricane evacuation are not the primary basis for this current request. But undersigned does ask that this Court view the current workload issues in the context of this solo practitioner's personal situation. Undersigned would not wish that anyone endure the suffering that his family has endured over the last two months.

Respectfully submitted,



James A. Brown, Jr.
Counsel for Appellant

October 24, 2019
Beaufort, SC

Law Offices of Jim Brown, PA
1600 Burnside Street, Suite 100
PO Box 592
Beaufort, SC 29901
(843) 470-0003

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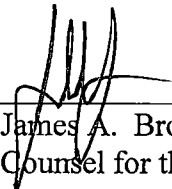
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CERTIFICATE OF SERVICE

I certify that I have served copies of this Appellant’s Reply to Respondent’s Return to Appellant’s Motion to Hold the Appeal in Abeyance or Alternatively for a Second Extension of Time on the Respondent, by depositing copies of this Motion in the United States Mail, postage prepaid, on October 24, 2019, addressed to his attorneys of record, Anthony E Griffis, Sr., at Griffis Law Office, 355 Park Ave SW., Aiken, SC 29801, and Sean Michael Bolchoz, at Bolchoz Law Firm, PA PO Box 22650 Hilton Head Island, SC 29925-2560.



James A. Brown, Jr.
Counsel for the Appellant

October 24, 2019
Beaufort, SC

Law Offices of Jim Brown, P.A.
1600 Burnside Street, Suite 100
P.O. Box 592
Beaufort, SC 29901-0592
(843) 470-0003

Law Offices of Jim Brown, P.A.

1600 Burnside St., Suite 100 • P.O. Box 592
Beaufort, SC 29901-0592

Phone: (843) 470-0003 Fax: (843) 470-0004

jimbrownlaw@hargray.com

www.attorneyjimbrown.com

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October 24, 2019

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, SC 29211

Re: Hargrove v. Griffis,

Appellate Court Number: 19-00941

Circuit Court Number: 18-CP-07-01449

Ms. Kitchings:

Please find enclosed Appellant's Reply to Respondent's Return to Appellant's Motion to Hold the Appeal in Abeyance or Alternatively for a Second Extension of Time, a Certificate of Service in the above mentioned case. Please contact our office should you have any questions or concerns.

Sincerely,


Jim Brown

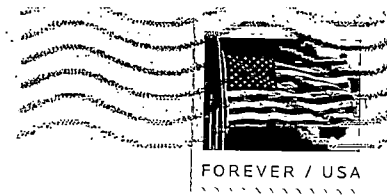
w/enclosures as indicated

cc: Sean Bolchoz, Counsel for Respondent, w/ enclosures
Anthony E. Griffis, Counsel for Respondent w/ enclosures
Christopher Stephen Truluck, w/ enclosures
Floyd Hargrove, w/ enclosures

LOJBPA
PO Box 592
Beaufort, SC 29901

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Clerk of Court
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