

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

Appellate Case No. 2019-001501

James John Todd Kincannon,

Appellant,

v.

Ashely Suzanne Griffith,
Moore Taylor Law Firm, P.A.,
Vance Stricklin, and Amber
Fulmer,

Respondents.

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Jul 27 2020

SC Court of Appeals

**APPELLANT'S MOTION AND ADA REQUEST FOR
EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF**

Other Counsel of Record:
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Appellant Pro Se

**APPELLANT’S MOTION AND ADA REQUEST FOR
EXTENSION OF TIME TO FILE INITIAL REPLY BRIEF**

Appellant respectfully moves for and, pursuant to the Americans with Disabilities Act (“ADA”), requests a fifteen day extension of time to serve and file his Initial Reply Brief. Respondents served their Initial Brief on July 17, 2020, which made the due date for Appellant’s Initial Reply Brief July 27, 2020. Appellant requests the Court grant Appellant a fifteen day extension to August 11, 2020. The basis for Appellant’s extension request is as follows:

1. As explained in Appellant’s prior extension requests, Appellant suffers from disabilities pursuant to the ADA that make it a practical impossibility for Appellant to comply with court deadlines that require drafting of complex litigation documents (like appellate briefs) or similar in-depth work. Appellant ordinarily needs an extension of about one and a half times the usual deadline. Accordingly, Appellant respectfully requests a fifteen day extension to the usual ten day deadline applicable to the preparation of reply briefs.

2. Respondents served their brief by first class mail on Friday, July 17, 2020. Appellant received it the evening of Tuesday, July 21, 2020. Appellant began working on his reply brief immediately upon receiving Respondents brief, has diligently worked on the reply brief since that time, and is approximately 40% done as of this writing the evening of July 27, 2020, the deadline date. Even if Appellant did not suffer from any disabilities, Appellant would likely still need an extension to fully prepare a well-drafted reply brief in this particular case, since Appellant has only had four business days to work on the reply brief.

CONCLUSION

Appellant respectfully requests the foregoing relief.

Respectfully submitted,

July 27, 2020

s/James John Todd Kincannon
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CERTIFICATE OF SERVICE

The undersigned Appellant hereby certifies that he has, on the date below, properly served the foregoing on opposing counsel.

July 27, 2020

s/James John Todd Kincannon

James John Todd Kincannon

Appellant Pro Se