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AUG 14 2020

**SC Court of Appeals**

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.

**APPELLANT'S MOTION FOR TWO-DAY EXTENSION OF TIME TO  
FILE INITIAL REPLY BRIEF DUE TO COMPUTER ERROR**

Other Counsel of Record:  
Ward Bradley  
Moore Taylor Law Firm  
1700 Sunset Blvd.  
West Columbia, SC  
Attorney for Respondents

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Simpsonville, SC 29681  
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ToddKincannon@gmail.com  
Appellant Pro Se

**APPELLANT'S MOTION FOR TWO-DAY EXTENSION OF TIME TO  
FILE INITIAL REPLY BRIEF DUE TO COMPUTER ERROR**

Appellant respectfully moves for a two day extension of time to serve and file his Initial Reply Brief, presently due on August 11, 2020. The extension would make the brief due on August 13, 2020. The reason for the extension request is a computer error related to the production of the brief as follows:

1. Appellant had substantially completed the Initial Reply Brief the evening of August 11, 2020 with only proofreading still remaining, and Appellant would have had no trouble completing the Initial Reply Brief prior to the deadline.
2. Appellant's computer then froze up for some reason while Appellant was proofing the brief, necessitating a restart of the computer.
3. When the computer restarted, Appellant re-opened Microsoft Word and inadvertently saved an incomplete, older version of the Initial Reply Brief rather than the "autosaved" near-final version that only needed to be proofread prior to serving and filing.
4. Appellant immediately began researching ways to recover the "autosaved" near-final version, but it quickly became apparent that the document is either (a) entirely unrecoverable or (b) possibly recoverable but only by someone with a substantially greater degree of computer skill than Appellant possesses.
5. Appellant lost approximately 12 hours worth of work on the Initial Reply Brief as a result of the autosave error. Appellant can probably reproduce the work in one day but respectfully requests a two-day extension to avoid the need for asking for yet another extension if the work ultimately takes two days.

**CONCLUSION**

Appellant respectfully requests the foregoing relief.

Respectfully submitted,

August 11, 2020



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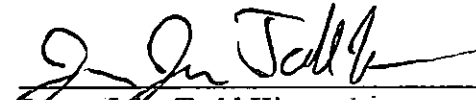
Ashely Suzanne Griffith,  
Moore Taylor Law Firm, P.A.,  
Vance Stricklin, and Amber  
Fulmer,

Respondents.

**CERTIFICATE OF SERVICE**

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

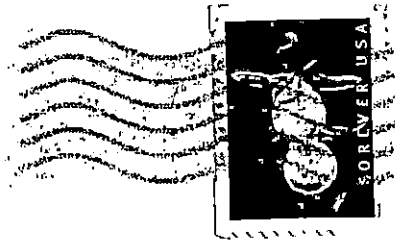
August 11, 2020

  
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James John Todd Kincannon  
Appellant Pro Se

Kincannon  
216 Jones Ave,  
Simpsonville, SC 29681

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**SC Court of Appeals**

S.C. Court of Appeals  
Attn: Clerk's Office  
P.O. Box 11629  
Columbia, SC 29211

29211-162929

