

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

**RECEIVED**

Robin B. Stilwell, Circuit Court Judge

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OCT 08 2020

**SC Court of Appeals**

Appellate Case No. 2019-001501

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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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**APPELLANT'S MOTION AND ADA REQUEST FOR  
EXTENSION OF TIME TO SERVE AND FILE FINAL BRIEFS**

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Other Counsel of Record:  
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Appellant Pro Se

**APPELLANT'S MOTION AND ADA REQUEST FOR  
EXTENSION OF TIME TO SERVE AND FILE FINAL BRIEFS**

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 final briefs, which were originally due on October 5, 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. In some cases Appellant also needs an extension of time to comply with court deadlines involving less in-depth work, such as preparation of final briefs, although Appellant usually needs less of an extension.
2. In this specific situation, Appellant has been in a serious depressive bipolar phase throughout the entirety of the twenty-day time period to prepare final briefs after the completion of the Record on Appeal, which Appellant did not need an extension to complete. Appellant's serious depressive phases make it a practical impossibility for him to complete any meaningful work of any kind.
3. Appellant's serious depressive phases rarely last longer than three to four weeks, and Appellant is confident that a fifteen day extension is all that will be needed to complete, serve, and file the final briefs.
4. Appellant greatly appreciates the Court's accommodations regarding prior extension requests and hopes this will be the last one necessary in this appeal.

**CONCLUSION**

Appellant respectfully requests the foregoing relief.

Respectfully submitted,



James John Todd Kincannon

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Appellant Pro Se

October 5, 2020

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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.

October 5, 2020

  
s/James John Todd Kincannon  
James John Todd Kincannon  
Appellant Pro Se

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SC Court of App  
P.O. Box 11629  
Columbia SC 29211

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SC Court of Appeals

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