

RECEIVED

Oct 26 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Thirteenth Circuit

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No.: 2019-001707

George H. Brock, Appellant,

v.

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC; Donna Carlson;
Jeremy Marsh, Individually, and d/b/a The Techknow Dude, LLC; and
Katherine Jernigan,Defendants,

Of Which

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC;
Donna Carlson; and Katherine Jernigan are theRespondents.

**RETURN TO RESPONDENTS'
MOTION FOR EXTENSION OF TIME**

Appellant George H. Brock (“Brock”) submits the following Return to Respondents’ Motion for Extension of Time.

The deadline for Respondents to serve and file their initial brief and designation of matter was September 25, 2020. No further extension would be granted absent extraordinary circumstances pursuant to the Court’s Order of August 13, 2020. Respondents failed to serve and file their initial brief and designation by September 25, nor did Respondents file any motion for extension of time due to extraordinary circumstances.

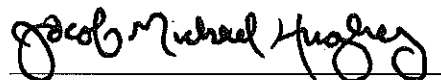
On October 12, 2020, the Court sent a letter to Respondents’ counsel, requiring him to serve and file Respondents’ initial brief and designation “[w]ithin ten days of the date of

this letter, . . . along with a motion requesting permission to serve and file the brief and designation outside of the filing deadlines set by Rules 208 and 209 of the SCACR.” (Appellant’s Return Ex. A.)

On October 22, 2020, Respondents filed a motion for extension of time. Respondents, however, failed to file their initial brief and designation and failed to file a motion to allow filing outside of the deadlines set by the SCACR. While a motion for extension of time may have been appropriate on or before September 25, the requirements of the Court’s October 12 correspondence were that, within ten days, Respondents file both their initial brief and a motion to allow late filing. “[R]espondents’ initial brief will not be considered if no motion is made within ten days of the date of this letter.” (Appellant’s Return Ex. A.)

Therefore, Brock respectfully requests that the Court deny Respondents’ Motion for Extension of Time and that the Court not consider Respondents’ initial brief, whenever it is filed.

Respectfully Submitted,



Jacob Michael Hughes
S.C. Bar No. 100646
HUGHES LAW FIRM, L.L.C.
1616A Paris Avenue West
Port Royal, South Carolina 29935
(864) 569-2498

Attorney for Appellant George H. Brock

October 26, 2020
Beaufort, South Carolina



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211
1220 SENATE STREET
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1890
FAX: (803) 734-1839
www.sccourts.org

October 12, 2020

Mr. Kenneth Edward Norsworthy, Jr., Esquire
NORSWORTHY LAW, LTD. CO.
218 TRADE STREET SUITE D
Greer SC 29651

Re: George H. Brock v. Kris Langville
Appellate Case No. 2019-001707

Dear Counsel:

Our records reflect that the time for serving and filing the respondents' initial brief and designation of matter has expired. Within ten days of the date of this letter, you may serve and file the respondents' initial brief and designation of matter, along with a motion requesting permission to serve and file the brief and designation outside of the filing deadlines set by Rules 208 and 209 of the SCACR. Your respondents' initial brief will not be considered if no motion is made within ten days of the date of this letter.

Very truly yours,

V. Claire Allen

CLERK

cc: Jacob Michael Hughes, Esquire

RECEIVED
Oct 26 2020
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
In the Court of Common Pleas for the Thirteenth Circuit

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No.: 2019-001707

George H. Brock, Appellant,

v.

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC; Donna Carlson;
Jeremy Marsh, Individually, and d/b/a The Techknow Dude, LLC; and
Katherine Jernigan, Defendants,

Of Which

Kris Langville, Individually, and d/b/a Preferred Paralegals, LLC;
Donna Carlson; and Katherine Jernigan are the Respondents.

CERTIFICATE OF SERVICE

I certify that on October 26, 2020, I served the foregoing Return to Respondents' Motion for Extension of Time upon all other counsel of record, by depositing copies of the same in the United States mail, first-class postage prepaid, addressed as follows:

Kenneth E. Norsworthy, Jr., Esq.
218 Trade Street, Suite D
Greer, South Carolina 29651
Attorney for Respondents


Jacob Michael Hughes

October 26, 2020
Beaufort, South Carolina

HUGHES LAW FIRM, L.L.C.

October 26, 2020

VIA U.S. MAIL

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

RECEIVED
Oct 26 2020
SC Court of Appeals

RE: *George H. Brock v. Kris Langville, et al.*
Appellate Case No.: 2019-001707

Dear Ms. Kitchings:

Enclosed herein for filing is Appellant's Return to Respondents' Motion for Extension of Time in the above-referenced case, along with the Certificate of Service.

By copy of this letter, I have served all other counsel of record, as indicated in the Certificate of Service.

With kindest regards, I am

Sincerely,


Jacob M. Hughes

Enclosures

cc (w/ enclosures): Kenneth E. Norsworthy, Jr., Esquire
218 Trade Street, Suite D
Greer, South Carolina 29651