

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM LEXINGTON COUNTY  
Court of Common Pleas

Robin B. Stilwell, Circuit Court Judge

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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.

**RECEIVED**  
**Oct 27 2020**  
**SC Court of Appeals**

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

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Appellant Pro Se

**APPELLANT’S FINAL MOTION AND ADA REQUEST FOR  
EXTENSION TO SERVE AND FILE FINAL BRIEFS**

Appellant respectfully moves for and, pursuant to the Americans with Disabilities Act (“ADA”), requests a final extension to serve and file final briefs to October 30, 2020. The basis for Appellant’s extension request is as follows:

1. Appellant **greatly** appreciates the Court’s prior and continued willingness to accommodate him in this matter. Due to his disabilities, it would be absolutely impossible for Appellant to participate in this appeal without the Court’s grace regarding deadlines.
2. Appellant has had exceptional difficulty preparing final briefs in this matter due to an extended depressive phase in his bipolar disorder and due to additional extreme difficulties with certain sensitive material in the Record on Appeal itself. Certain images within the Record on Appeal cause Appellant extreme psychiatric distress and interfere with Appellant’s ability to complete tasks related to final brief preparation.
3. Despite these problems, Appellant has fully completed finalizing the main brief and is approximately 75% finished finalizing the reply brief.
4. Appellant respectfully requests an extension of time to October 30, 2020 in order to finish finalizing the reply brief and to file and serve both the final main brief and the final reply brief.
5. Appellant assures the Court that this will be the last extension request relating to preparation of the final briefs. This request supersedes the prior extension request of five days that has not yet been ruled on (and that, if granted,

would last until October 27, 2020). Appellant apologizes to the Court for the serial extension requests but Appellant has simply faced more of a struggle completing the tasks associated with final brief preparation than Appellant anticipated. Had Appellant known how difficult these tasks would be, Appellant would have requested a thirty day extension initially and not bothered the Court with additional extension requests.

### CONCLUSION

Appellant respectfully requests the foregoing relief.

Respectfully submitted,

October 27, 2020

s/James John Todd Kincannon

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Appellant Pro Se

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**CERTIFICATE OF SERVICE**

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

October 27, 2020

s/James John Todd Kincannon

James John Todd Kincannon

Appellant Pro Se