

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 AND ADA REQUEST FOR ADDITIONAL
FIVE-DAY EXTENSION TO SERVE AND FILE FINAL BRIEFS**

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

James John Todd Kincannon
216 Jones Avenue
Simpsonville, SC 29681
864-963-4374
ToddKincannon@gmail.com
Appellant Pro Se

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SC Court of Appeals

**APPELLANT'S MOTION AND ADA REQUEST FOR ADDITIONAL
FIVE-DAY EXTENSION TO SERVE AND FILE FINAL BRIEFS**

Appellant respectfully moves for and, pursuant to the Americans with Disabilities Act (“ADA”), requests an additional five day extension of time to serve and file his final briefs, which were due on October 20, 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. 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 certain court deadlines, although Appellant is able to comply with them with given reasonable extensions.

3. Appellant previously requested and received a fifteen day extension to prepare and file final briefs in this matter because Appellant was suffering through a lengthy depressive phase of his bipolar disorder that makes work of this nature a practical impossibility.

4. Appellant hoped the depressive phase would subside and that no further extension would be needed, but Appellant’s depressive phase unexpectedly lasted longer than usual and did not meaningfully subside until Sunday, October 18, 2020. Unfortunately, as Appellant has recently learned, bipolar disorder is an unpredictable disorder with respect to phases and sometimes Appellant simply

guesses wrong as to how long a particular depressive phase will last.

5. Appellant has diligently worked to finalize briefs since then but has only managed to complete approximately 90% of the Main Brief and has not yet been able to commence work on the Reply Brief.

6. Appellant is certain that an additional extension of five days will be sufficient for him to complete work on both the Main Brief and the Reply Brief.

Appellant therefore respectfully requests an additional extension of five days.

CONCLUSION

Appellant respectfully requests the foregoing relief.

Respectfully submitted,



s/James John Todd Kincannon

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Appellant Pro Se

October 20, 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 20, 2020


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

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