

**RECEIVED**

**Nov 17 2022**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
S. Phillip Lenski, Administrative Law Judge

Case No.: 22-ALJ-22-0098-AP

---

Appellate Case No. 2022-000982

---

Miya S. Freeman, Appellant,

v.

South Carolina Department of Employment  
and Workforce and Amazon Com Services, Inc, Respondents.

---

**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL BRIEF  
AND DESIGNATION OF MATTER**

---

Pursuant to Rule 263(b), SCACR, Respondent South Carolina Department of Employment and Workforce (the Department) respectfully submits this motion requesting a twenty-day extension of time to file Respondent's Initial Brief and Designation of Matter.

On October 18, 2022, Appellant filed and served her Appellant's Initial Brief.<sup>1</sup> Pursuant to Rule 208(a)(2), the Department's Initial Brief is due November 17, 2022. The Department's counsel respectfully requests a twenty-day extension, until December 7, 2022, to file its Initial

---

<sup>1</sup> Appellant, however, did not file or serve her Designation of Matter as required by Rule 209, SCACR. This Court sent Appellant a deficiency letter on October 19, 2022, and Appellant perfected her initial brief by filing and serving her Designation of Matter on October 27, 2022. It is noted, Appellant's filed Designation appears unsigned in C-track.

Brief and Designation of Matter. The Department's counsel requests this extension due to an abnormally high workload and because Department's counsel has been away from the office several days dealing with personal medical issues. As a result, additional time is needed to file and serve Respondent's Initial Brief and Designation of Matter.

For the foregoing reasons, the Department respectfully moves that its motion be granted. Further, the Department requests all time limits and deadlines be held in abeyance pending the resolution of this motion.

Respectfully Submitted,



Valerie McMellan (SC Bar No. 101080)  
SC Department of Employment and Workforce  
Post Office Box 8597  
Columbia, SC 29202  
803-737-0395 (P)  
803-737-0124 (F)  
[legal@dew.sc.gov](mailto:legal@dew.sc.gov)

November 17, 2022

**Attorney for Respondent SC Department of  
Employment and Workforce**

**RECEIVED**

**Nov 17 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE  
ADMINISTRATIVE LAW COURT  
S. Philip Lenski, Administrative Law Judge  
Case No: 22-ALJ-22-0098-AP

Appellate Case No. 2022-000982

Miya Freeman.,

Respondents,

v.

South Carolina Department of Employment and  
Workforce and Amazon.com Services,

Appellant.

PROOF OF SERVICE

I certify that I have served the South Carolina Department of Employment and Workforce' Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter on the parties in this case by depositing a copy of it in the United States Mail, postage prepaid, on November 17, 2022, addressed to the parties at their addresses of record:

Miya S. Freeman  
405 Grand National Lane  
Elgin, South Carolina 29045

Amazon.com Services  
Post Office Box 1650  
Clearwater, Florida 33766

November 17, 2022



Amy Proveaux  
Sr. Paralegal  
South Carolina Department of Employment and  
Workforce  
Post Office Box 8597  
Columbia, South Carolina 29202  
(803) 737-0395

P.O. Box 995  
1550 Gadsden Street  
Columbia, SC 29202  
dew.sc.gov



Henry McMaster  
Governor

G. Daniel Ellzey  
Executive Director

Post Office Box 8597  
Columbia, SC 29202  
Telephone: (803) 737-2666  
Fax: (803) 737-0124  
November 17, 2022

**RECEIVED**  
**Nov 17 2022**  
**SC Court of Appeals**

**VIA Email to: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Mia Freeman v. SC Department of Employment and Workforce and Amazon.com Services, Inc.  
Appellate Case No: 2022-000982

Dear Ms. Kitchings:

Attached, please find the Department and Employment and Workforce' Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter, along with the Proof of Service upon all parties in this matter.

Please contact me at the number listed above if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Amy Proveaux", is written over the typed name.

Amy Proveaux  
Paralegal for Valerie McMellan  
Attorney for Respondent South Carolina  
Department of Employment and Workforce