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Nov 29 2023

SC Court of Appeals

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

ALC Case No. 23-ALJ-04-0003-AP
Appellate Case No. 2023-001384

Ronald Ceo, #258464,Appellant,

v.

South Carolina Department of Corrections.....Respondent.

RESPONDENT’S MOTION FOR EXTENSION OF TIME

The Final Brief of Respondent is due to be served and filed on November 29, 2023. Respondent is hereby requesting a twenty-day extension in which to file Respondent’s Final Brief. No previous extensions have been requested on behalf of Respondent. This extension request is not being made for the purpose of delay; instead, it is being made to ensure the Final Brief is properly prepared. Respondent did not receive the Record on Appeal until November 20, 2023, the week of the Thanksgiving holidays.

WHEREFORE, Respondent respectfully requests this Court extend the deadline for the service and filing of the Final Brief of Respondent in this case by twenty-days from the date such relief is granted and hold the matter in abeyance pending a ruling this motion.

SIGNATURE PAGE TO FOLLOW

Respectfully submitted,

**SOUTH CAROLINA DEPARTMENT
OF CORRECTIONS**



Joseph R. Shakibanasab, SC Bar No. 102825
Deputy General Counsel
Office of General Counsel
S.C. Department of Corrections
Post Office Box 21787
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Phone: (803) 896-1278

ATTORNEY FOR RESPONDENT

November 29, 2023

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PROOF OF SERVICE

Undersigned counsel hereby certifies that on today's date he mailed a copy of the

Respondent's Motion for Extension of Time to the Appellant, addressed as follows:

Ronald Ceo, SCDC #258464
Dorm-Rom-Bunk: M1B-0003-B
MacDougal Correctional Institution
1516 Old Gilliard Road
Ridgeville, SC 29472

Joseph R. Shakibanasab, SC Bar No. 102825
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Phone: (803) 896-1278
Counsel for Respondent

November 29, 2023



SOUTH CAROLINA
DEPARTMENT OF CORRECTIONS
Safety, Service, and Stewardship

HENRY McMASTER, Governor
BRYAN P. STIRLING, Director

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SC Court of Appeals

OFFICE OF GENERAL COUNSEL

November 29, 2023

Via Email to ctappfilings@sccourts.org

The Honorable Jenny A. Kitchings
Clerk of Court, S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Ronald Ceo, #258464, v. South Carolina Department of Corrections
Appellate Case No. 2023-001384

Dear Ms. Kitchings:

Enclosed, please find the **Respondent's Motion for Extension of Time** in the above captioned appeal, along with the **Proof of Service**.

Thank you for your attention to this matter, and please do not hesitate to contact me should you have any questions or concerns.

Sincerely,

Joseph R. Shakibanasab
South Carolina Department of Corrections

Enclosures

cc: Inmate Ronald Ceo, #258464