

101043

**MOTION FOR EXTENSION OF TIME TO
SUBMIT REPLY TO RESPONDENT’S RESPONSE
TO MOTION FOR SUPPLEMENTAL RECORD ON APPEAL,
And MOTION TO REQUEST HEARING TO DISCUSS REPLY
TO RESPONDENT’S RESPONSE TO MOTION FOR SUPPLEMENTAL
RECORD ON APPEAL**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

RECEIVED

FEB 13 2024

SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of
Juvenile Justice

Respondent.

**MOTION FOR EXTENSION OF TIME AND MOTION TO REQUEST HEARING TO
DISCUSS REPLY TO RESPONDENT’S RESPONSE TO MOTION FOR SUPPLEMENTAL
RECORD ON APPEAL**

Appellant is formally requesting at this time for the Court to consider a Motion For Extension of Time To Reply To Respondent’s Response to Motion for Supplemental Record on Appeal. Additionally, Appellant is formally requesting at this time a Motion To Request Hearing To Discuss Reply To Respondent’s Response To Motion for Supplemental Record On Appeal. It was the intent and expectation of the Appellant to have opportunity, as stated by the rules of the

Court to give a reply (within five days) to the respondent's response to this or any Motion issued by Appellant. However, although having only received the Respondent's Response on February 8th at 5:30 PM, Appellant has not received that opportunity by the Court, due to receiving the related Order of the Court on February 9th at 4:00 PM. Appellant is therefore, confused about the lack of opportunity for proper reply. Appellant does dispute the facts and opinion as presented by the Response given by the Respondent's Attorney. Appellant, therefore, is requesting a formal hearing in the Court to relieve confusion, to discuss the concerns, receive explanation for why the Response (for the second time) was received outside of the allotted timeframe given by the rules of the Court, and why the Appellant was neither given notice by the Respondent or the Court for any granted extension with proper service. It is imperative that Appellant also have opportunity to have on record the arguments for reply as there is no concession to the facts as presented by the Respondent in his document, and it appears the Court has adopted the recommendation of at least some of the requests by the Respondent's Attorney given in his Response.

February 11, 2024



Michael Carwane, pro se

302 The Heights Third Ave

Saluda, South Carolina 29138

(828) 301-7106

**PROOF OF SERVICE: MOTION FOR EXTENSION OF TIME TO SUBMIT REPLY TO
RESPONDENT'S RESPONSE TO MOTION FOR SUPPLEMENTAL RECORD ON
APPEAL, And MOTION TO REQUEST HEARING TO DISCUSS REPLY TO
RESPONDENT'S RESPONSE TO MOTION FOR SUPPLEMENTAL RECORD ON
APPEAL.**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of
Juvenile Justice

Respondent.

PROOF OF SERVICE

I certify that I have served the Motion For Extension of Time To Submit Reply To Respondent's Response To Motion For Supplemental Record On Appeal, And Motion To Request Hearing To Discuss Reply To Respondent's Response To Motion For Supplemental Record On Appeal , on Respondent SCDJJ by depositing a copy of it in the United States Mail, postage prepaid, on February 12, 2024 addressed to Attorney Eugene H. Matthews, Richardson Plowden Robinson Attorneys, P.O. Drawer 7788, Columbia, SC 29202.

February 12, 2024



Michael Carwane, pro se

302 The Heights Third Avenue

RECEIVED

FEB 13 2024

SC Court of Appeals

Saluda, SC 29138

(828) 301-7106

**PROOF OF SERVICE: MOTION FOR EXTENSION OF TIME TO SUBMIT REPLY TO
RESPONDENT'S RESPONSE TO MOTION FOR SUPPLEMENTAL RECORD ON
APPEAL, And MOTION TO REQUEST HEARING TO DISCUSS REPLY TO
RESPONDENT'S RESPONSE TO MOTION FOR SUPPLEMENTAL RECORD ON
APPEAL.**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

S. Phillip Lenski, Administrative Law Judge

Appellate Case No. 2023-001342

Michael Carwane ,

Appellant.

v.

South Carolina Department of

Respondent.

Juvenile Justice

PROOF OF SERVICE

I certify that I have served the Motion For Extension of Time To Submit Reply To Respondent's Response To Motion For Supplemental Record On Appeal, And Motion To Request Hearing To Discuss Reply To Respondent's Response To Motion For Supplemental Record On Appeal , on South Carolina Court Of Appeals by depositing a copy of it in the United States Mail, postage prepaid, on February 12, 2024 addressed to SC Court of Appeals, Clerk of Court, Jenny Abbott Kitchings, P.O. Box 11629, Columbia, SC, 29211

February 12, 2024



Michael Carwane, pro se

302 The Heights Third Avenue

RECEIVED

FEB 13 2024

SC Court of Appeals

Saluda, SC 29138
(828) 301-7106

Michael Camare
302 The Heights Third Ave
Spartanburg SC 29138



Retail



U.S. POSTAGE PAID
FCM LG ENV
LEESVILLE, SC 29070
FEB 12, 2024

RDC 99

\$9.68
R2303S103227-8

RECEIVED
FEB 13 2024
SC Court of Appeals

SC Court of Appeals
Clerk of Court, Jenny Abbott Kitchings
P.O. Box 11629
Columbia, SC 29211

