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**Mar 11 2026**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Administrative Law Judge Robert L. Reibold

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ALC Case No. 24-ALJ-04-0618-AP  
Appellate Case No. 2025-001423

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JAMES EDWARD JOHNSON, JR., # 353643,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT.

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**MOTION TO REQUIRE APPELLANT TO FILE A CORRECTED RECORD ON  
APPEAL**

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Comes now Respondent, through undersigned counsel, and requests that this Court require Appellant to file a corrected Record on Appeal. The relevant facts supporting this request are as follows.


In attempting to prepare Respondent's Final Brief, undersigned counsel realized that Appellant's Record on Appeal fails to contain all the matter designated by Respondent. The Record served on February 27, 2026 contains only three items: (1) Response to Motion to Dismiss/Motion for Summary Judgment; (2) Motion to Amend; and (3) Motion for Injunction. The Record does not contain the ALC Order of Dismissal dated May 29, 2025, as Designated in

Respondent's Designation of Matter filed on November 6, 2025. The lower court's order is, of course, critical to the appeal.

Because Appellant has not provided a proper Record on Appeal as required by SCACR, Rule 210(c), Respondent cannot file a proper Final Brief of Respondent with correct record references, and this Court cannot properly consider the case. Accordingly, Respondent respectfully requests that this Court require Appellant to file a corrected Record on Appeal as described above. Respondent further requests that this Court hold the time period for any filings in abeyance pending resolution of this motion.

Respectfully submitted,

**SOUTH CAROLINA DEPARTMENT  
OF CORRECTIONS**

BY:   
**CHRISTINA CATOE BIGELOW**  
Deputy General Counsel  
Office of General Counsel  
S.C. Department of Corrections  
Post Office Box 21787  
Columbia, South Carolina 29221  
(803) 896-8508

**ATTORNEY FOR RESPONDENT**

March 11, 2026

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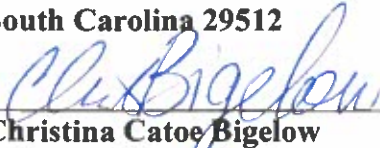
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**CERTIFICATE OF SERVICE**

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Undersigned counsel hereby certifies that on this date, she mailed a copy of the **Motion to Require Appellant to File a Corrected Record on Appeal** to Appellant, addressed as follows:

**James Edward Johnson, # 353643  
Evans Correctional Institution  
1A-0187  
610 Highway 9 West  
Bennettsville, South Carolina 29512**

  
**Christina Catoe Bigelow**  
Office of General Counsel  
S. C. Department of Corrections  
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March 11, 2026



**SOUTH CAROLINA**  
DEPARTMENT OF CORRECTIONS  
*Office of General Counsel*

HENRY McMASTER, Governor  
JOEL E. ANDERSON, Interim Director

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**Mar 11 2026**

**SC Court of Appeals**

OFFICE OF GENERAL COUNSEL

March 11, 2026

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

**RE: James Edward Johnson, Jr. # 353643 v. South Carolina Department of Corrections**  
**Appellate Case No. 2025-001423**

Dear Ms. Kitchings:

Enclosed please find the **Motion to Require Appellant to File a Corrected Record** in the above captioned appeal, along with **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,

Christina Catoe Bigelow  
Deputy General Counsel  
South Carolina Department of Corrections

cc: James Edward Johnson, # 353643  
Evans Correctional Institution  
1A-0187  
610 Highway 9 West  
Bennettsville, South Carolina 29512