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SC Court of Appeals

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Administrative Law Judge Robert L. Reibold

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

JAMES EDWARD JOHNSON, # 353643,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS,

RESPONDENT.

MOTION TO ALLOW RESPONDENT TO SUBMIT A PAGINATED AMENDED RECORD ON APPEAL

Comes now Respondent, through undersigned counsel, and requests that this Court allow Respondent to submit a consecutively paginated record on appeal. The relevant facts supporting this request are as follows.

On March 11, 2026, Respondent submitted a Motion to Require Appellant to File a Corrected Record on Appeal because the Record submitted by Appellant did not contain all matter designated by the parties. On April 23, 2026, the Motion was granted. Following an extension, Appellant submitted an Amended Record on Appeal dated August 31, 2026. Although this Amended Record does contain the matter designated, it is not consecutively paginated as required by the rules. Therefore, in order to avoid further unnecessary delays,

Respondent respectfully requests that this Court allow it to submit the attached paginated Amended Record on Appeal as the record in this case. 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

September 17, 2026

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RESPONDENT.

CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that on this date, she mailed a copy of the **Motion to Allow Respondent to Submit a Paginated Amended 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
Deputy General Counsel
S. C. Department of Corrections
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(803) 896-8508

September 17, 2026

SCDC
SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
"CORRECTIONAL EXCELLENCE TODAY FOR A SAFER SOUTH CAROLINA TOMORROW"

Joel E. Anderson | Director

Office of General Counsel

OFFICE OF GENERAL COUNSEL

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September 17, 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, # 353643 v. South Carolina Department of Corrections**
Appellate Case No. 2025-001423

Dear Ms. Kitchings:

Enclosed please find the **Motion to Allow Respondent to Submit a Paginated Amended Record on Appeal** in the above captioned appeal, along with **Proof of Service**. Also enclosed is the proposed paginated **Amended Record on Appeal**.

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