

PATRICIA L. HARRISON
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611 HOLLY STREET
COLUMBIA, SOUTH CAROLINA 29205

TELEPHONE (803) 256-2017

FAX (803) 256-2213

February 14, 2014

Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201

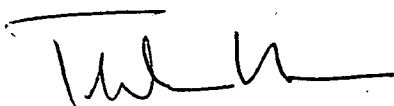
RE: Waddle v. DHHS
Docket No. 13-ALJ-08-0267-AP

Dear Clerk Kitchings:

Enclosed is the Certificate of Service for the Motion which was filed on February 11, 2014 and hand delivered that same day to opposing counsel's office. We have been unable to deliver this Certificate due to closings of state offices related to the storm. We attempted to deliver the Certificate today to the Court and Ms. Reibold, but the Court was closed, so we are sending by mail. Please advise if you need anything else from my office.

Please clock and return the enclosed copy in the stamped envelope provided. Thank you for your consideration and assistance in this matter.

Cordially,



Patricia L. Harrison

cc: Shealy B. Reibold, Esq.
South Carolina Department of Health and Human Services
PO Box 8206
Columbia, South Carolina 29202-8206

RECEIVED
FEB 18 2014
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Carolyn C. Matthews, Administrative Law Judge

Case 2013-002415

Brook Waddle Appellant,

v

South Carolina Department of Health and Human Services Respondent.

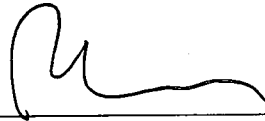
SECOND MOTION TO SERVE AND FILE
APPELLANT'S INITIAL BRIEF OUT OF TIME

The undersigned moves to Serve and File Appellant's Initial Brief out of time. Grounds for this motion are that Appellant's counsel's laptops were stolen on January 31, 2013, which contained the draft brief and delays have been incurred in obtaining a new computer and restoring files. This is Appellant's second request for an extension. The first extension was requested after DHHS issued an order in another case involving the same parties and an attempt to settle the case was made. Unfortunately, that attempt to settle was not successful. Appellant requests an additional six days to file her Initial Brief, which was due on February 10, 2014, extending the due date February 16, 2014.

Appellant's counsel has attempted to communicate with opposing counsel by telephone and email, but has been unable to reach her. This Motion is being hand delivered to opposing counsel.

February 11, 2014

RECEIVED
FEB 11 2014
SC Court of Appeals



Patricia L. Harrison
611 Holly Street
Columbia, South Carolina
(803) 256 2017
Attorney for Brook Waddle

RECEIVED
FEB 18 2014
SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Case No. 2013-002415

Brook Waddle,

Appellant,

v

South Carolina Department of Health
and Human Services,

Respondent.

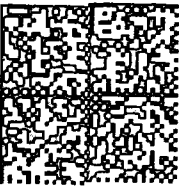
CERTIFICATE OF SERVICE

Patricia L. Harrison certifies that she has served the Second Motion to Serve and File Appellant's Initial Brief Out of Time in the above captioned case on The South Carolina Department of Health and Human Services by hand delivery to the Office of General Counsel, SC Dept of Health and Human Services, 1801 Main Street, Columbia, SC 29202 on February 11, 2014.



Patricia L. Harrison
611 Holly Street
Columbia, South Carolina 29205
(803) 256-2017

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FEB 18 2014
SC Court of Appeals



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PATRICIA L. HARRISON
ATTORNEY AT LAW
611 HOLLY STREET
COLUMBIA, SOUTH CAROLINA 29205

TO:

Honorable Jenny Abbott Kitchings
SC of Appeals Clerk of Court
1015 Sumter Street
Columbia, South Carolina 29201