

Albarr - Ali Abdullah, #191449,  
Appellant,

v.

South Carolina Department of  
Probation, Parole and Pardon Services,  
Respondent.

STATE OF SOUTH CAROLINA  
In The Court of Appeals  
Case No.: 2014 - 000185

MOTION FOR ENLARGEMENT  
OF TIME TO FILE INITIAL  
BRIEF

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SEP 04 2014

Appellant, Albarr - Ali Abdullah, #191449, pursuant to **SC Court of Appeals** Rule 6(B)(1), SCACP moves the court for an order extending the deadline for the Appellant to file an Initial Brief in the above case.

In this case Appellant originally filed the Notice of Appeal on August 8, 2014. Rule 208, SCACP requires the Brief of Appellant to be filed and served within 30 days after serving the Notice of Appeal. In this case the Notice of Appeal was timely served on all parties on 8-8-2014, therefore, Rule 208(a)(1) required Appellant to file and serve the Brief of Appellant on or about 9-8-2014.

For the reason listed below Appellant moves the Court to extend the deadline to file and serve the Initial Brief until October 10, 2014.

Appellant would respectfully show unto this court the below in support of this motion:

1. Appellant is unable to afford counsel. He has requested leave to proceed in forma pauperis.

2. Appellant has no legal training and does not have a high school diploma or GED.

3. Appellant is imprisoned and has been since 1992. His imprisonment greatly limits his ability to litigate. The issues in this case are complex and requires significant research and

investigation. Appellant has limited access to the law library and limited knowledge of the law.

4. The helping tools in the prison law library at the Facility Appellant is confined at have been malfunctioning and unavailable to Appellant since on or before August 20, 2014. As of today's date - 8-28-2014 the research tools for legal research in this facility's law library continue to malfunction and are unavailable for the use of Appellant.

5. Appellant is incarcerated and has no other access to legal research tools other than the prison law library where he's currently confined.

WHEREFORE, Appellant request that the court enlarge the time for Appellant to file the Initial Brief in this case until October 10, 2014 and/or in the alternative extend the time for Appellant to file the Initial Brief until 30 days after Appellant notifies the court of the date Appellant has access to legal research tools in the law library at the prison he's confined in; and grant Appellant such other such other and further relief the Court deems just and proper in this case.

Respectfully submitted,  
51 Alban Ali Abdullah

Albarr - Ali Abdullah # 191449  
Appellant, Pro se  
Kershaw Correctional Institution  
4848 Goldmine Highway  
Kershaw, South Carolina 29067

Date 9-2-2014

Albarr - Ali Abdullah, #191449,  
Appellant,

STATE OF SOUTH CAROLINA  
In The Court of Appeals  
Case No.: 2014-000185

v.

CERTIFICATE OF  
SERVICE

South Carolina Department of  
Probation, Parole and Pardon Services,  
Respondent.

I, Albarr - Ali Abdullah, #191449 the Appellant in the above captioned case certify that I have served a copy of Appellant's Motion For Enlargement of Time To File Initial Brief in the above captioned case on Tommy Evans, Jr. Assistant General Counsel, for Respondent, SCDPPPS by depositing a copy of it in the United States Mail, postage prepaid, on 9-2-2014, addressed to: Tommy Evans, Jr. Esquire, Assistant General Counsel, SCDPPPS, Post Office Box 50666, Columbia, South Carolina 29250.

Respectfully submitted,  
Ali Abdullah

Albarr - Ali Abdullah, #191449  
Kershaw Correctional Institution  
4848 Goldmine Highway  
Kershaw, South Carolina 29067

Date 9-2-2014

Sworn to and subscribed

before me this 2<sup>nd</sup> day of sep, 2014.

Catherine C. Chreco

NOTARY PUBLIC OF SOUTH CAROLINA

My commission expires: ~~My Commission Expires December 22, 2019~~

LEGAL

Albarr - Ali Abdullah # 191449  
Kershaw Correctional Institution  
4848 Goldmine Highway  
Kershaw, South Carolina 29067  
August 2, 2014

Jenny A. Kitchings,  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, South Carolina 29211

Re: Albarr - Ali Abdullah v. SCDPPS  
Case No.: 2014-000185

Dear Ms. Kitchings:

Please find enclosed an original and one copy of Appellant's Motion For Enlargement of Time to File Initial Brief in the above referenced appeal case # 2014-000185. Please file and process the enclosed and return a clocked in copy to me for my records.

Thank you in advance for any time and attention you give this matter.

Sincerely,  
51 Albarr Ali Abdullah

Albarr - Ali Abdullah # 191449  
Appellant, Pro Se  
Kershaw Correctional Institution  
4848 Goldmine Highway  
Kershaw, South Carolina 29067  
Date 9-2-2014

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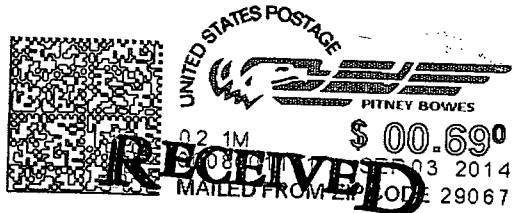
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**SC Court of Appeals**

**LEGAL**

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Kershaw Correctional Institution  
4848 Goldmine Highway  
Kershaw, South Carolina 29067

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SC Court of Appeals

Janny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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