

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Carolyn C. Matthews, *Administrative Law Judge*

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Lower Case No. 2014-ALJ-04-0055-AP

Appellate Case No. 2014-002356

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Michael Goins, # 302385,.....Appellant,

v.

South Carolina Department of Corrections.....Respondent.

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**RESPONDENT'S MOTION TO ENLARGE TIME TO FILE INITIAL BRIEF**

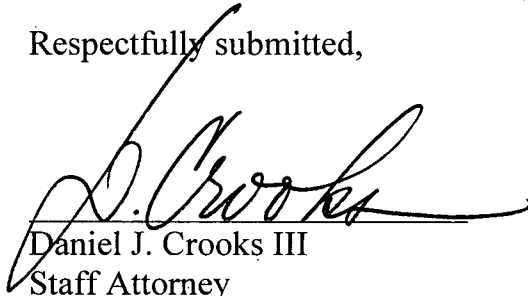
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COMES NOW, Respondent, South Carolina Department of Corrections (SCDC or Department) and, pursuant to Rule 240, SCACR, moves this Honorable Court for an order enlarging the time for filing of Respondent's initial brief until January 30, 2015. This is the first request for an extension on this appeal, and Respondent files this motion in good faith and only to allow it ample time to reply to Appellant's claims.

WHEREFORE the Department so moves.

*[signature block on following page]*

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. Crooks III", written over a horizontal line.

Daniel J. Crooks III  
Staff Attorney  
S.C. Department of Corrections  
P.O. Box 21787  
Columbia, South Carolina 29221  
(803) 896-19355 [direct]

*Counsel for Respondent*

Columbia, South Carolina

December 23, 2014

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Michael Goins, #302385,.....Appellant,

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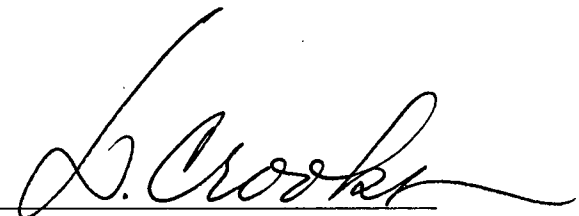
South Carolina Department of Corrections.....Respondent.

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this day I have served a copy of the foregoing **MOTION TO ENLARGE** upon Appellant by depositing a copy of same in the United States Mail, addressed to: Michael Goins, #302385, Perry Correctional Institution, 430 Oak Lawn Rd. Pelzer, S.C. 29669



Daniel J. Crooks III  
Staff Attorney  
S.C. Department of Corrections  
P.O. Box 21787  
Columbia, South Carolina 29221  
(803) 896-19355 [direct]

Dated: December 23, 2014



NIKKI R. HALEY, Governor  
BRYAN P. STIRLING, Director

OFFICE OF GENERAL COUNSEL

December 23, 2014

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

Reference: App. Case No.: 2014-002356  
*Michael Goins (5), # 302385 v. S.C. Department of Corrections*

Dear Ms. Kitchings:

Enclosed, please find one (1) original and one (1) copy of Respondent's *Motion to Enlarge*. Kindly file the original and stamp and return the clocked-in copy to me.

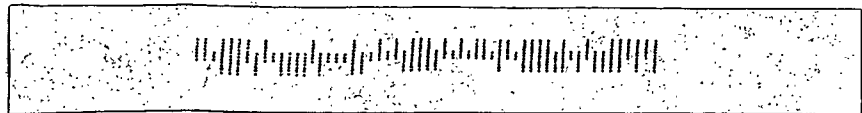
Thank you for your assistance.

Very Truly Yours,

Daniel J. Crooks III

Enclosures

cc: Michael Goins, #302385  
Perry Correctional Institution  
430 Oak Lawn Rd.  
Pelzer, S.C. 29669



Office of General Counsel  
P.O. Box 21787/4444 Broad River Road  
Columbia, South Carolina 29221-1787

**RECEIVED**  
DEC 29 2014  
**SC Court of Appeals**

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