

THE STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM THE COURT OF COMMON PLEAS

Honorable G. Thomas Cooper, Jr.
Circuit Court Case No.: 2007-CP-40-03365
Appellant Case No. 2014-001373

Edward Mims, by and through his legal
guardian, Margaret Mims,
Appellant

vs.

Babcock Center, Inc., Judy Johnson, the
South Carolina Department of Disabilities
and Special Needs, Kathi Lacy and Stan
Butkus,

Respondent.

MOTION TO FILE DESIGNATION OF MATTER OUT OF TIME
AND
TO EXCEED PAGE LIMIT BY TWELVE PAGES

Appellant moves to file the Designation of Matter out of Time and to Exceed the Page Limit by Twelve Pages and this is the second motion to extend the time to file the Designation. Ground for this motion are that Appellant's counsel has had other deadlines, the size of the record and that Mims has been hospitalized, making it difficult to get together with his guardian to review. Appellant requests an additional five days to file the Designation of Matter and agrees to consent to an extension of time, if needed by Respondents. The Designation of Matter was due on December 4, 2014 and, if this extension is granted, the new due date will be December 9.

Appellant also moves to exceed the page limit by twelve pages, due to the complexity of the case, the need to cover both federal and state law, the large volume of material to be covered by the Brief and the number of issues on appeal. Counsel has eliminated two issues, but has been unable to reduce the pages of the Brief to fifty. Permission is requested to include 62 pages in Appellant's Initial Brief. The proposed Initial Brief is attached.

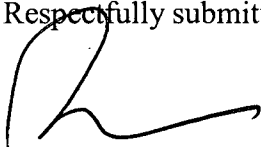
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Respectfully submitted,

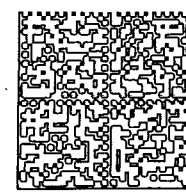
A handwritten signature in black ink, appearing to be 'PLH', written over the word 'Respectfully' in the preceding line.

Patricia Logan Harrison, Esquire
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Columbia, Sc 29205
803-256-2017

Attorney for Appellant

December 4, 2014

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FROM:

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TO:

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