

Kevin J. Daniels #247291,
Appellant;

v.

South Carolina Department of
Corrections; Respondent.

STATE OF SOUTH CAROLINA
In The Court of Appeals
Appellate Case No.: 2014-002613
Motion For Enlargement of Time
File Appellant's Brief

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Pursuant to the South Carolina Rules of Civil Procedure, SCRCP Appellant moves for an order enlarging the time to file Appellant's Brief. In support of this motion Appellant states:

1. Appellant is unable to file his brief within 30 days of the date of 12-4-2014 when he filed his notice of appeal due to the below facts: Appellant's imprisonment greatly limits his ability to access legal materials for legal research; the issues in this case are complex, and will require significant research and investigation. Appellant has limited access to the law library and limited knowledge of the law.

2. Appellant filed his Notice of Appeal on 12-4-2014, therefore his brief is due according to SCACR, on January 4, 2015 thirty days after he filed his Notice of Appeal;

3. Due to the fact of the Christmas holiday closings of prison facilities, i.e., the law library, education department and prison staff vacation times in the ensuing weeks of the holiday season between 12-18-2014 and January 1, 2015, Appellant's access to the law library and notary services are severely limited.

WHEREFORE, Appellant request that the court enlarge the time for appellant to file his brief from January 4, 2015 to February 4, 2015.

Respectfully Submitted,

Kevin J. Daniels

Kevin J. Daniels #247291

Appellant, pro-se

Kershaw Correctional Institution

4848 Goldmine Highway

Kershaw, South Carolina 29067

Date 12-19-2014.

LEGAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals
APPEAL FROM THE ADMINISTRATIVE LAW COURT
John D. McLeod, Administrative Law Judge

Appellate Case No.: 2014-002613

Kevin J. Daniels, #247291

Appellant,

v.

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South Carolina Department of
Corrections,

Respondent.

PROOF OF SERVICE

I, Kevin J. Daniels, #247291, Appellant in the above entitled case certify that I have served a copy of Appellant's Motion for Enlargement of Time on Daniel J. Crooks, III, Esquire, Staff Attorney, South Carolina Department of Corrections, by depositing a copy of it in the United States mail, postage pre-paid, on 12-19-14 addressed to: Daniel J. Crooks, III, Esquire, Staff Attorney, South Carolina Department of Corrections, Post Office Box 21787, Columbia, South Carolina 29221.

Dated: 12-19-2014.

Kevin J. Daniels
Kevin J. Daniels, #247291

Appellant, pro-se

Hershaw Correctional Institution
4848 Goldmine Highway
Hershaw, South Carolina 29067

LEGAL

Kevin J. Daniels, #247291
Kershaw Correctional Institution
4848 Goldmine Highway
Kershaw, South Carolina 29067
December 19, 2014

Jenny A. Kitchings, Clerk
South Carolina Court of Appeals
Post Office Box 11029
Columbia, South Carolina 29211

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SC Court of Appeals

Re: Kevin J. Daniels v. SCDC
Appellate Case No.: 2014-002613

Dear Ms. Kitchings:

Please find enclosed a copy of a motion for enlargement of time and a proof of service showing service of same upon counsel for Respondent. 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,



Kevin J. Daniels, #247291
Appellant, pro-se
Date 12/19/2014

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Kevin J. Daniels, #247291
Kershaw Correctional Institution
4242 Goldmine Highway
Kershaw, South Carolina 29067

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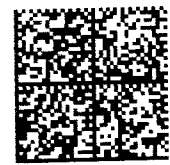
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South Carolina Court of Appeals
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