

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT

Carolyn C. Matthews, Administrative Law Judge

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Trial Court Case No. 14-ALJ-04-00282-AP  
Appellate Case No. 2014-002172

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**RECEIVED**  
JAN 05 2015  
**SC Court of Appeals**

Joshua Cramer, #251406, ..... Appellant,

v.

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

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**RESPONDENT'S SECOND MOTION FOR A 30-DAY EXTENSION OF THE  
DEADLINE BY WHICH IT MAY FILE ITS INITIAL BRIEF  
AND DESIGNATION OF MATTER**

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For the reasons stated below, the Respondent, the South Carolina Department of Corrections, by and through its undersigned counsel, again respectfully moves the Court for a 30-day extension of the deadline by which it may file its initial brief and designation of matter to be included in the record on appeal in the instant case.

By a motion filed December 4, 2014, the Respondent's undersigned counsel moved for a 30-day extension of the aforementioned deadline, and, by an order filed December 9, 2014, this Court granted the motion filed by the Respondent's undersigned counsel. Specifically, this Court declared that the time for serving and filing the Respondent's initial brief and designation of matter was extended until January 4, 2015.

The Respondent's undersigned counsel now move, in light of continuing activity in other cases in which they are involved as well as personal obligations associated with the recently concluded holiday season, for a second extension of the deadline by which the Respondent may file its initial brief and designation of matter in the instant case.

The Respondent's undersigned counsel have, since they received the Appellant's initial brief and designation of matter, been engaged in post-trial activity associated with the matter styled as *Ashley Reeves as the Personal Representative for the Estate of Reeves v. Town of Cottageville, Cottageville Police Department & Randall Price*; Civil Action No. 2:12-2765-DCN (United States District Court – Charleston Division). The federal court heard post-trial motions in *Reeves* on December 16, 2014, and, as of the date of the instant motion, the federal court has not yet issued its ruling.

Additionally, the Respondent's undersigned counsel have continued their involvement in discovery activity associated with two (2) other cases: (1) *Deanna Conn as Personal Representative for the Estate of Lacy D. Lamb v. City of Woodruff and/or Woodruff City Police Department and William Todd Knight*; Civil Action No. 7:14-00038-BHH (United States District Court – Spartanburg Division) and (2) *Anthony Satterwhite, individually and as Personal Representative of the Estate of Ernest Satterwhite v. Edgefield County, Edgefield County Sheriff's Office, and North Augusta Department of Public Safety*, Civil Action No. 2014-CP-19-0202 (Court of Common Pleas – Edgefield County).

Therefore, the Respondent's undersigned counsel respectfully urges this Court to grant their instant motion, and, accordingly, the Respondent's undersigned counsel respectfully urges this Court to again extend the deadline by which the Respondent must file its initial brief and

designation of matter to be included in the record on appeal in the instant matter until Tuesday, February 3, 2015.

**RESPECTFULLY SUBMITTED,**



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Counsel for Respondent

Columbia, South Carolina  
January 5, 2015

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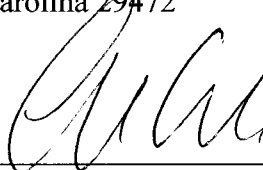
South Carolina Department of Corrections, ..... Respondent.

**PROOF OF SERVICE**

I certify that I have served the Respondent's **SECOND MOTION FOR A 30-DAY EXTENSION OF THE DEADLINE BY WHICH IT MAY FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER** on the above named *pro se* Appellant by mailing a copy to him, first class postage pre-paid, at the following address:

Joshua Cramer, #251406  
Lieber Correctional Institution  
SA-17  
Post Office Box 205  
Ridgeville, South Carolina 29172

January 5, 2015



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Lake E. Summers