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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT

Carolyn C. Matthews, Administrative Law Judge

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

Joshua Cramer, #251406, Appellant,

v.

South Carolina Department of Corrections, Respondent.

**RESPONDENT’S MOTION FOR AN EXTENSION OF THE
DEADLINE BY WHICH IT MAY FILE ITS INITIAL BRIEF
AND DESIGNATION OF MATTER UNTIL FEBRUARY 9, 2015**

For the reasons stated below, the Respondent, the South Carolina Department of Corrections, by and through its undersigned counsel, respectfully moves the Court for an 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 until Monday, February 9, 2015.

The Respondent’s undersigned counsel so move in light of continuing activity in other cases in which they are involved as well as personal obligations.

The Respondent’s undersigned counsel (Summers) participated in depositions on Monday, February 2, 2015 and Tuesday, February 3, 2015 in the matter styled as *McSwain Laws v. Florence-Darlington Technical College, Carolina Elevator Service, Inc., and the South*

Carolina Department of Labor, Licensing and Regulation, Civil Action No. 2014-CP-21-1235
(Court of Common Pleas – Florence County).

On Thursday, January 29, 2015, the Respondent's undersigned counsel (Summers) also participated in a lengthy mediation session in Greenville in the matter styled as *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).

The Respondent's undersigned counsel (Summers) spent considerable time during the week beginning Monday, January 26, 2015 preparing for the aforementioned mediation session. The Respondent's undersigned counsel also attended the deposition of his client by opposing counsel in Spartanburg on Monday, January 19, 2015, and he further traveled back to Spartanburg on Tuesday, January 20, 2015 to observe testing activity undertaken by expert witnesses retained by opposing counsel.

Furthermore, the Respondent's undersigned counsel (Summers) has continued with discovery activity associated with *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).

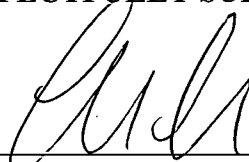
The Respondent's undersigned counsel respectfully advises the Court that his associate (Phillips) spent the week beginning Monday, January 26, 2015 out of state on a long-planned family vacation.

Finally, the Respondent's undersigned counsel respectfully advises the Court that they both are attending the video reply of the 30th Annual North Carolina and South Carolina Labor &

Employment Law Course at the Bar Conference Center in Columbia (Phillips on Tuesday, February 3 and Wednesday, February 4; Summers on Wednesday, February 4).

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 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 Monday, February 9, 2015.

RESPECTFULLY SUBMITTED,



Lake E. Summers

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Counsel for Respondent

Columbia, South Carolina
February 4, 2015

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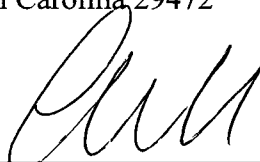
South Carolina Department of Corrections, Respondent.

PROOF OF SERVICE

I certify that I have served the Respondent's **MOTION FOR AN EXTENSION OF THE DEADLINE BY WHICH IT MAY FILE ITS INITIAL BRIEF AND DESIGNATION OF MATTER UNTIL FEBRUARY 9, 2015** 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 29472

February 4, 2015



Lake E. Summers