

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
APR 06 2015

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURTS

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 TO FILE
THE RESPONDENT'S FINAL BRIEF OUT OF TIME**

The Respondent, the South Carolina Department of Corrections, by and through its undersigned counsel, respectfully moves the Court for leave to file its final brief no later than Monday, April 13, 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 associated with the recent Easter holiday weekend.

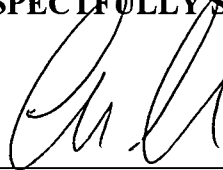
As an aside, the Respondent's undersigned counsel respectfully notes that the Respondent has not served upon them the final version of his Reply Brief dated February 19, 2015.

Concerning the Respondent's instant motion, the Respondent's undersigned counsel (Summers) participated in a day-long mediation session held on Tuesday, March 31, 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). The Respondent's undersigned counsel (Summers) spent considerable time prior to the aforementioned mediation session preparing materials for consideration by the mediator, parties, and counsel.

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 grant the Respondent's instant motion for leave to file the Respondent's final brief no later than Monday, April 13, 2015.

RESPECTFULLY SUBMITTED,



Lake E. Summers
Katherine A. Phillips
Malone, Thompson, Summers & Ott LLC
339 Heyward Street, Suite 200
Columbia, South Carolina 29201
Office: (803) 254-3300
Fax: (803) 254-0309
E-mail: summers@mtsolfirm.com
phillips@mtsolfirm.com

Counsel for Respondent

Columbia, South Carolina
April 6, 2015

RECEIVED

APR 06 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the 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,

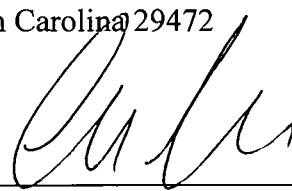
v.

South Carolina Department of Corrections, Respondent.

PROOF OF SERVICE

I certify that I have served the **RESPONDENT'S MOTION TO FILE THE RESPONDENT'S FINAL BRIEF OUT OF TIME** 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



Lake E. Summers

April 6, 2015