

STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

Appeal from the Administrative Law Court
Deborah Durden, Administrative Law Judge
15-ALC-15-0003
Appellate Case No.: 2015-000478

BERNARD BAGLEY,APPELLANT

v.

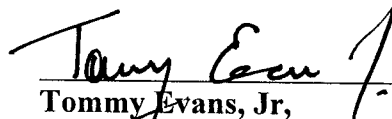
S.C. DEPARTMENT OF PROBATION, PAROLE
AND PARDON SERVICES,RESPONDENT

**MOTION OBJECTING TO APPELLANT'S
RECORD ON APPEAL (APPENDIX)**

Comes now, Tommy Evans, Jr., Legal Counsel for the South Carolina Department of Probation, Parole and Pardon Services (the Department), and respectfully objects to Appellant's Record on Appeal (Appendix) as it is untimely filed. On March 11, 2015, Respondent filed an objection to the Designation of Matter proposed by Appellant and that Motion has not yet been ruled upon by the Court.

Therefore, Appellant's Record on Appeal (Appendix) is untimely and should be dismissed. Furthermore, all time lines should be held in abeyance until Respondent's Motions are ruled on.

Respectfully submitted,



Tommy Evans, Jr,
Assistant General Counsel
South Carolina Department of Probation,
Parole and Pardon Services
P. O. Box 50666
Columbia, South Carolina 29250

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v.

S.C. DEPARTMENT OF PROBATION, PAROLE
AND PARDON SERVICES,RESPONDENT

CERTIFICATE OF SERVICE

I, Dawn K. Nichols, Executive Administrative Assistant to counsel for Respondent, certify that I have served the within Motion Objecting to Appellant's Record on Appeal (Appendix) dated April 23, 2015, on Appellant this 23rd day of April, 2015, by depositing a copy of the same in the United States mail, postage prepaid, addressed to:

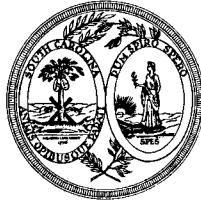
Bernard Bagley, #175851
Kershaw Correctional Institution-HD133
4848 Goldmine Highway
Kershaw, S.C. 29067



Dawn Nichols
Executive Administrative Assistant
South Carolina Department of Probation,
Parole, and Pardon Services
P. O. Box 50666
Columbia, South Carolina 29250

State of South Carolina
Department of Probation, Parole and Pardon Services

NIKKI R. HALEY
Governor



JERRY B. ADGER
Director

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April 23, 2015

The Honorable Jenny Kitchings
Clerk of the S.C. Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

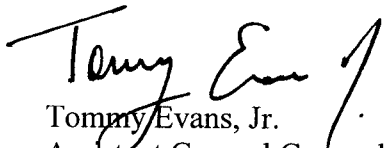
Re: Bernard Bagley v SCDPPPS

Dear Ms. Kitchings:

Please find enclosed for filing the original and six (6) copies of Respondent's *Motion Objecting to Appellant's Record on Appeal (Appendix)* dated April 23, 2015, along with proof of service in the above referenced case.

Thank you for your cooperation in this matter.

Sincerely,


Tommy Evans, Jr.
Assistant General Counsel
TE:dn

Enclosures

cc: Bernard Bagley

State of South Carolina
Department of Probation, Parole, and Pardon Services
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