

STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from the Administrative Law Court
Deborah Durden, Administrative Law Judge
15-ALC-15-0009
Appellate Case No. 2015-000689

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JUL 02 2015

SC Court of Appeals

Thomas Lowery, 83240,

Appellant,

v.

South Carolina Department of Probation, Parole
and Pardon Services,

Respondent.

RETURN OPPOSING RESPONDENT'S MOTION
TO APPELLANT'S RECORD ON APPEAL AS PREMATURE

Thomas Lowery, #83240, the Appellant, pro se, comes now opposing the Respondent's Motion Objecting to Appellant's Record on Appeal as Premature. The Appellant has submitted his Record on Appeal within 30 days after service of his Final Brief and it should be accepted in the timelines for filing. In addition, if Appellant did not submit his Record of Appeal at this time the Respondent would have filed a Motion Objecting to Appellant's Record on Appeal as untimely or out of time. It appears that the Appellant is between a rock and a hard place, as well as other inmate litigants when a Record on Appeal is submitted to the Court by them. The Respondent appears to have it both ways, premature and out of time. The Record on Appeal is not prejudice, and it should have been apart of the pre-parole investigations, i.e. contents and documents.

s/ *Thomas Lowery*

Thomas Lowery, #83240
HD-235/KER.CI
4848 Goldmine Hwy.
Kershaw, SC 29067

June 29, 2015

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CERTIFICATE OF SERVICE

I, Thomas Lowery, Appellant, pro se, certify that I have served the within
Return Opposing Respondent's Motion Objecting to Appellant's Record on Appeal
as Premature dated June 29, 2015, on Respondent this 29th day of June, 2015,
by depositing a copy of the same in the U.S. Mail, postage prepaid, addressed

to: Tommy Evans, Jr.,
Assistant General Counsel
SCDPPPS
P.O. Box 50666
Columbia, SC 29250

s/ *Thomas Lowery*
Thomas Lowery, 83240
KER.CI/HD-235
4848 Goldmine Hwy.
Kershaw, SC 29067

THOMAS LOWERY 083240
KER C.I. HD 235
4848 Goldmine Hwy
KERSHAW S.C. 29067

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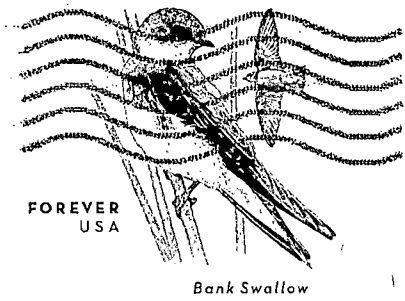
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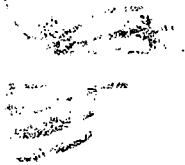
SC Court of Appeals

South Carolina Court of Appeals
Jenny ABBOTT KITCHINGS CLERK
1220 Senate STREET

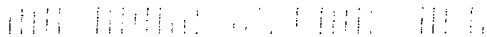
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