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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

JUL 08 2015

The Hon. Robert E. Hood, Circuit Court Judge

SC Court of Appeals

Appellate Case No.: 2015-000244

Kerry Paul,

Appellant,

v.

South Carolina Department of
Employment and Workforce,

Respondent.

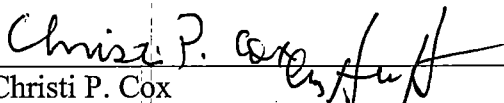
RESPONDENTS' MOTION TO FILE AND SERVE
INITIAL BRIEF ON OR BEFORE JULY 17, 2015

Respondent South Carolina Department of Employment and Workforce, by and through its undersigned counsel, moves for an Order allowing Respondent through July 17, 2015 to file and serve its Initial Brief. In support of this motion, Counsel would show that on June 15, 2015 pursuant to Rule 208 SCACR Respondent moved for an Order dismissing this appeal for Appellant's failure to file and serve her initial brief on or before June 11, 2015. Subsequent to the submission of the Motion to Dismiss, Appellant filed her initial brief out of time, on June 17, 2015. Respondent received Appellant's brief in the mail on June 16, 2015.

The Court has not yet ruled upon Respondent's Motion to Dismiss. Out of an abundance of caution, and so as not to delay these proceedings, Respondent intends to file and serve a responsive brief within thirty days of the filing of Appellant's brief. So as to allow Respondent a full thirty days to prepare an adequate response to the Appellant's Initial Brief, Respondent requests that the Court fix the initial deadline for the Respondent's initial brief to July 17, 2015.

[SIGNATURE PAGE ATTACHED]

July 6, 2015.


Christi P. Cox
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(803) 329-7672
ATTORNEYS FOR APPELLANTS

Other Counsel of Record:

Nancy Bloodgood
895 Island Park Drive
Suite 202
Charleston, SC 29492

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHALND COUNTY
Court of Common Pleas

The Hon. Robert E. Hood, Circuit Court Judge

Case No.: 2014-CP-40-00271

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SC Court of Appeals

Kerry Paul,

Appellant,

v.

South Carolina Department of
Employment and Workforce,

Respondent.

PROOF OF SERVICE

The undersigned certifies that she has served this Motion for Extension of Time to File Respondent's Initial Brief on the Appellant by depositing a copy of it in the United States Mail, postage prepaid, on July 6, 2015, addressed to its attorney of record, Nancy Bloodgood, 895 Island Park Drive, Suite 202, Charleston, SC 29492.

July 6, 2015

Christi P. Cox
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SC Court of Appeals

Office of the Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: *Kerry Paul vs. South Carolina Department of Employment and Workforce*
Appellate Case No.: 2015-000244
Our File No.: 11655-011

To whom it may concern:

I have enclosed the original and seven copies of Respondent's Motion for Extension of Time to Respond to Initial Brief in connection with the above-referenced matter. Please file the original and return one clocked copy to me in the envelope I have enclosed. I have enclosed a check in the amount of \$25.00 to cover the filing fee.

By copy of this letter to Nancy Bloodgood, counsel for the Appellant, I have enclosed a copy of the Motion for Extension of Time.

Thank you again for your assistance in this matter.

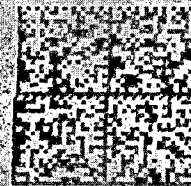
Sincerely,


L. Melia Sweatt
Paralegal

/lms
Enclosures
cc: Nancy Bloodgood
895 Island Park Drive
Suite 202
Charleston, SC 29492

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