

7 6540

RECEIVED

JUL 13 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Honorable Thomas A. Russo, Circuit Court Judge

Case No: 2015-001138

Melvin Roberts.....Appellant

v.

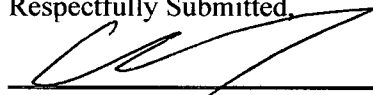
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South Carolina
.....Respondent

MOTION TO REQUEST EXTENSION

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 30-day extension of time to file the Appellant's Initial Brief and Record on Appeal. This request is made as a result that the Appellant's Counsel having recently received the Transcript in this matter is presently experiencing a significant case-load including several upcoming trials which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation.

For the reason set forth herein, counsel for the Appellant submits that good cause has been shown why the time limits prescribed by the Rules should be changed and the Appellant be given an additional thirty (30) day period with which to file any objections to the Brief and Record on Appeal.

Respectfully Submitted,



Charles T. Brooks, III /Bar ID#11762
309 Broad Street
Post Office Box 3512
Sumter, SC 29151
(803) 418-5708

Sumter, SC
July 8, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUL 13 2015

SC Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas
Honorable Thomas A. Russo, Circuit Court Judge

Case No: 2015-001138

Melvin Roberts.....Appellant

v.

Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South
CarolinaRespondent

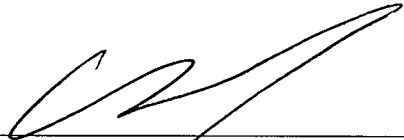
PROOF OF SERVICE

I, the undersigned, do hereby certify that on this July 8, 2015, I served the foregoing **MOTION FOR EXTENSION** as well as **Proof of Service** in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on July 8, 2015, addressed to the following as indicated below:

Office of SC Attorney General
ATTN: Courtney E. Lowell
Post Office Box 11549
Columbia, South Carolina 29211

SLED
Adam L. Whitsett, Esq.
Post Office Box 21398
Columbia, South Carolina 29221-1398

Dated: July 8, 2015


Charles T. Brooks, III
Attorney for the Appellant
309 Broad Street
Sumter, South Carolina 29150
(803) 418-5708

The Brooks Law Office, LLC

CHARLES T. BROOKS, III, ATTORNEY AT LAW

IRMA R. BROOKS, ATTORNEY AT LAW

309 BROAD STREET ~ SUMTER, SOUTH CAROLINA 29150

POST OFFICE BOX 3512 ~ SUMTER, SOUTH CAROLINA 29151

(803) 418-5708

FAX: (803) 934-9618 TOLL FREE: (877) 770-8792

Email: cbrooks@ctbrooks.com

RECEIVED

JUL 13 2015

SC Court of Appeals

July 8, 2015

South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

RE: Roberts vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al
2015-001138

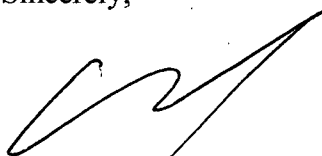
To Whom It May Concern:

Enclosed herewith please find the original and six (6) copies of the Motion for Extension and Proof of Service in the above titled matter. I have also provided the necessary fee for this Motion.

Thank you for your attention to this matter. If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,



Charles T. Brooks, III

CTB,III/jlm

Enclosures as stated

cc: Office of SC Attorney General
ATTN: Courtney E. Lowell
Post Office Box 11549
Columbia, South Carolina 29211

SLED
Adam L. Whitsett, Esq.
Post Office Box 21398
Columbia, South Carolina 29221

The Brooks Law Offices, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29150



South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED
JUL 13 2015
SC Court of Appeals