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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUL 17 2015
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Hon. Robert E. Hood, Circuit Court Judge

Appellate Case No.: 2015-000244

Kerry Paul,

Appellant,

v.

South Carolina Department of
Employment and Workforce,

Respondent.

RESPONDENT'S NOTICE OF WITHDRAWAL OF ITS MOTION TO DISMISS
AND REQUEST FOR EXTENSION OF TIME TO FILE INITIAL BRIEF

Appellant's Initial Brief was due on June 11, 2015. On June 15, Respondent moved for an order dismissing the Appeal, which stayed all further deadlines by the Court, including the deadline for the filing of Respondent's Initial Brief and Designation of Matter on Appeal. At this time, Respondent is withdrawing its Motion to Dismiss.

Respondent further moves and respectfully requests that it be allowed an extension to file its Initial Brief until August 10, 2014. Respondent needs this additional time to prepare an adequate response to the Appellant's Initial Brief. By seeking this extension, Respondent is essentially requesting one full thirty (30) day extension from July 13, 2015 to file its Initial Brief, which would be the Respondent's original due date as calculated from June 11, 2015.

Counsel for Respondent has consulted with Appellant's Counsel about this matter and she consents.

[SIGNATURE PAGE ATTACHED]

July 16, 2015.



Christi P. Cox
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& CARROLL, LLC
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(803) 329-7672
ATTORNEYS FOR APPELLANTS

Other Counsel of Record:
Nancy Bloodgood
895 Island Park Drive
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Charleston, SC 29492

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Court of Common Pleas

JUL 17 2015

SC Court of Appeals

The Hon. Robert E. Hood, Circuit Court Judge

Case No.: 2014-CP-40-00271

Kerry Paul,

Appellant,

v.

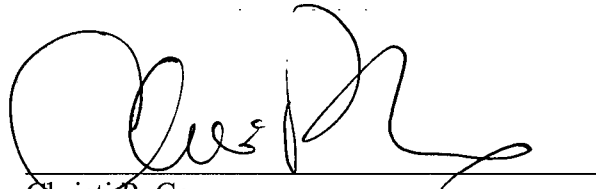
South Carolina Department of
Employment and Workforce,

Respondent.

PROOF OF SERVICE

The undersigned certifies that she has served the Respondent's Notice of Withdrawal of its Motion to Dismiss and Request for Extension of Time to File Initial Brief by depositing a copy of it in the United States Mail, postage prepaid, on July 16, 2015, addressed to its attorney of record, Nancy Bloodgood, 895 Island Park Drive, Suite 202, Charleston, SC 29492.

July 16 2015



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Attorneys for Respondent

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SC Court of Appeals

July 16, 2015

VIA FACSIMILE AND FEDERAL EXPRESS

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

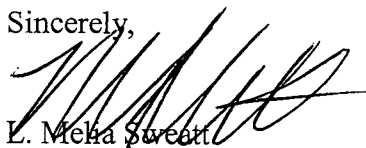
To whom it may concern:

I have enclosed the original and seven copies of Respondent's Notice of Withdrawal of its Motion to Dismiss and Request 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 Notice and Request for Extension.

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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