

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

John D. McLeod, Administrative Law Judge

Case No. 14-ALJ-22-454-AP

Charles E. Stubbs,

Appellant,

v.

South Carolina Department of
Employment and Workforce and
JSE, LLC,

Respondents.

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AUG 10 2015

SC Court of Appeals

**MOTION TO ENLARGE TIME TO FILE INITIAL BRIEF OF
APPELLANT AND DESIGNATION OF MATTER TO BE INCLUDED IN
RECORD ON APPEAL**

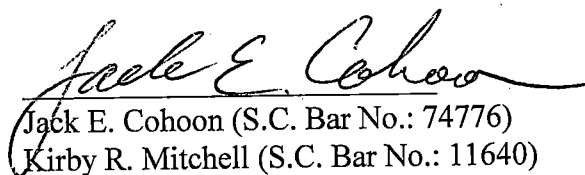
Appellant Charles E. Stubbs filed the Notice of Appeal on July 9, 2015. Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal are due to be served and filed on Monday, August 10, 2015. Appellant's counsel's time to prepare these documents has been limited due to personal and professional obligations, including litigation in an unrelated matter filed in the original jurisdiction of the South Carolina Supreme Court. Appellant's counsel respectfully request a thirty (30) day extension of time to file the above-referenced documents. Counsel for Respondent South Carolina Department of Employment and Workforce has informed Appellant's counsel that the Respondent does not oppose this motion.

This motion is made in good faith, is not for the purpose of delay, and is necessary to properly complete the serving and filing of these documents.

August 10, 2015

(signature is on the following page)

SOUTH CAROLINA LEGAL SERVICES

A handwritten signature in cursive script that reads "Jack E. Cohoon". The signature is written in black ink and is positioned above the typed contact information.

Jack E. Cohoon (S.C. Bar No.: 74776)

Kirby R. Mitchell (S.C. Bar No.: 11640)

2109 Bull Street

Columbia, South Carolina 29201

Office: (803) 744-4166

Fax: (803) 799-1781

jackcohoon@sclegal.org

Attorneys for Charles E. Stubbs

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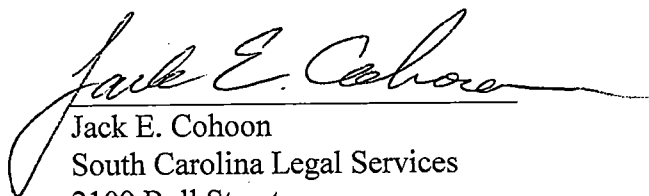
SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the *Motion to Enlarge Time to File Initial Brief of Appellant and Designation of Matter to be Included in Record on Appeal* on Respondents S.C. Department of Employment and Workforce and JSE, LLC by depositing a copy of them in the United States mail, postage prepaid, on August 10, 2015, addressed to their counsel of record or designated representative as follows:

Mara Dawson Baker, Esq.
Assistant General Counsel
S.C. Dept. of Emp. And Workforce
P.O. Box 8597
Columbia, SC 29202

JSE, LLC
c/o Theresa Rhodes
5000 Thurmond Mall
Suite 114
Columbia, SC 29201


Jack E. Cohoon
South Carolina Legal Services
2109 Bull Street
Columbia, South Carolina 29201
Office: (803) 744-4166; Fax: (803) 799-1781
jackcohoon@sclegal.org



**South Carolina
Legal Services**

Balancing the Scales of Justice
Jack E. Cohoon (803) 744-4166

2109 Bull Street, Columbia, South Carolina 29201
Phone: (803) 799-9668 Fax: (803) 799-1781

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August 10, 2015

Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate St.
Columbia, SC 29201

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SC Court of Appeals

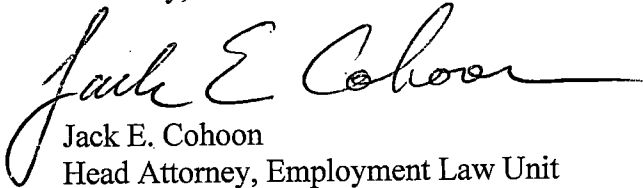
Re: Charles E. Stubbs v. SCDEW
Appellate Case No. 2015-001490
Our File No. 14-0623723

Dear Ms. Kitchings:

Enclosed please find a *Motion to Enlarge Time to File Initial Brief of Appellant and Designation of Matter to be Included in Record on Appeal and Proof of Service* in the above-referenced case.

Please do not hesitate to call me at (803) 744-4166 if I can be of any assistance.

Sincerely,


Jack E. Cohoon
Head Attorney, Employment Law Unit

Cc: Maura Dawson Baker, Asst. General Counsel
JSE, LLC

