

APPELLANT'S VERIFIED\* MOTION  
TO FILE REPLY BRIEF  
OUT OF TIME

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE ADMINISTRATIVE LAW COURT  
CAROLYN C. MATTHEWS, ADMINISTRATIVE LAW JUDGE

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LOWER CASE NO. 2014-ALJ-040771-AP

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APPELLATE CASE NO. 2015-000183

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George Cleveland, III,  
#35770,

**RECEIVED**  
AUG 10 2015  
SC Court of Appeals  
APPELLANT

SOUTH CAROLINA DEPARTMENT  
OF CORRECTIONS,

RESPONDENT.

APPELLANT'S VERIFIED\* MOTION

APPELLANT'S VERIFIED MOTION:

1. Appellant, George Cleveland, III,  
Respectfully files this verified motion  
to order the filing of my Reply  
BRIEF to the Respondents' INITIAL  
Brief out of time for the following  
REASONS:

1-1. TRANSFERRED to ANOTHER PRISON  
FROM MACDOUGALL BECAUSE OF A  
COURT HEARING FROM JULY 29-AUG.  
03, 2015.

1-2. SUMMARY JUDGEMENT FILING IN ANOTHER  
CASE,

1-3. ON AUG 04-05, 2015, READING CASES  
CITED BY RESPONDENT, HANDWROTE REPLY  
BRIEFS, AND HAD THEM NOTARIZED.

UNDER OATH STATEMENT:

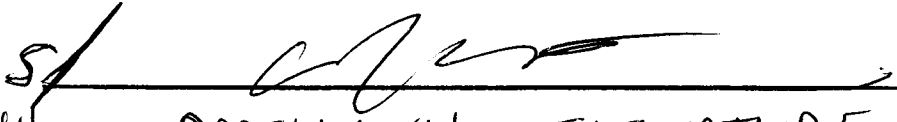
2. I, George Cleveland, III swears under the penalty of perjury the following is true and correct to the best of my knowledge:
- \*3. On the evening of July 28, 2015, I was ordered to pack-up at MacDougall Correctional, my assigned institution.
4. I was transported to a common pleas court hearing on July 30, 2015 at the Richland County Courthouse by Broad River Correctional's transportation officials. I stayed at this prison from July 28 - August 03, 2015.
5. I was not allowed to take any

ink pens, extra paper, work on any other pending case the entire time at Broad River, in fact, I was confined to my cell-room the entire time at this institution, supra.

6. ON August 03, 2015, I completed my response to summary judgement on another case; all my research had been completed in that case,
- \* 7. ON August 04-05, 2015, I researched relevant cases cited by the Respondent in this case; Appellate case no. 2015-000183; hand-wrote a rough-draft, final draft for this court, and a copy for Respondent; and August 06, 2015 was the earliest I could mail these -

Documents off, i.e., Reply BRIEF,  
PROOF OF SERVICE, AND this motion.  
AS I had to get them NOTARIZED  
by PRISON STAFF here.

State of SC County of Berkeley  
The foregoing instrument was acknowledged before me  
this 6th day of Aug, 2015  
by George Cleveland  
Lisa M. Cross Notary Public  
My Commission Expires Jan 16 2024

  
APPELLANT'S SIGNATURE

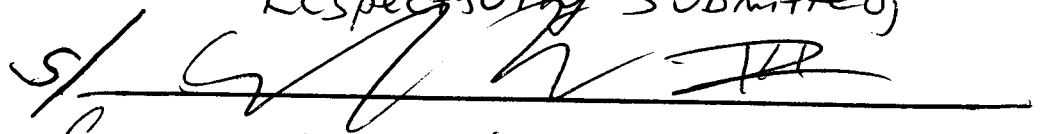
LISA M. CROSS  
Notary Public, State of South Carolina  
My Commission Expires 1/16/2024

8. This ends my NOTARIZED PART,

9. I submit, I missed my August 03,  
2015 DEADLINE FROM my FIRST GRANTED  
intervention with this COURT because  
of the S.C.D.C. REFUSAL to ALLOW me  
to take legal MATERIAL with me  
to BROAD-RIVER CORRECTIONAL,

NOR, WAS I ALLOWED ACCESS TO  
THEIR LAW LIBRARY CAUSING ME  
ACTUAL INJURY BY THE LATE FILINGS  
OF MY REPLY BRIEF UNDER  
LEWIS V. CASEY, 518, U.S., 343,  
116, S. CT., U.S., ARIZ (1996) ID  
AT 2174 (DENIAL OF ACCESS TO THE  
COURTS); ACCORDING, I RESPECTFULLY  
REQUEST THIS COURT TO GRANT THIS  
MOTION OF: FILING MY REPLY  
BRIEF TO THE RESPONDENTS' INITIAL  
BRIEF AS TIMELY FILED.

Respectfully Submitted,



George Cleveland, III # 357770  
MACDOUGALL CORRECTIONAL INST,  
1516 OLD GILLIARD ROAD  
RIDGEVILLE, S.C. 29472

DATED: 8-6-15

APPELLANT'S PROOF OF SERVICE

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
CAROLYN C. MATTHEWS, ADMINISTRATIVE LAW  
JUDGE

LOWER CASE NO. 2014-ALJ-04-0771-AP

APPELLATE CASE NO. 2015-000183

George Cleveland, III,  
#357770,

APPELLANT,

v.

SOUTH CAROLINA DEPARTMENT  
OF CORRECTIONS,

RESPONDENT.

**RECEIVED**

AUG 10 2015

SC Court of Appeals

APPELLANT'S PROOF OF SERVICE

PROOF OF SERVICE:

1. I, George Cleveland, III, proceeding pro se, certifies that on the date below, I served on the Respondent by United States Mail with proper postage affixed to the following:

- 1-1. APPELLANT'S Reply BRIEF;
- 1-2. APPELLANT'S VERIFIED\* MOTION TO FILE REPLY BRIEF OUT OF TIME, to the following address;

2. S.C.D.C.  
OFFICE OF GENERAL COUNSEL  
c/o MR. DANIEL J. CROOKS, III, STAFF ATTORNEY  
P.O. Box 21787  
Columbia, S.C. 29221.

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APPELLATE CASE NO. 2015-000183

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Respectfully submitted,



George Cleveland, III, #357770  
MACDUGALL CORRECTIONAL INST.  
1516 OLD GILLIARD ROAD  
Ridgeville, S.C. 29472

DATED: August 06, 2015

PAGE 1 OF 1

5

PAGE 1 OF 2  
August 06, 2015

the south CAROLINA court of Appeals  
Jenny Abbott Kitchings, CLERK  
P.O. Box 11629  
Columbia S.C. 29211

RECEIVED

AUG 10 2015

Re: Appellant's Reply Brief,  
AND motion to file out of time  
Appellate case No. 2015-000183;  
George Cleveland, III, #3577200  
S.C.D.C.

1. DEAR MRS. Kitchings,

Attached to this letter is  
my Reply Brief to Respondent's  
Initial Brief, Proof of Service,  
and my verified motion to  
file my Reply Brief AS timely?

2. CAN YOU FORWARD MY  
out of time filing motion to  
A justice for his or her  
consideration?

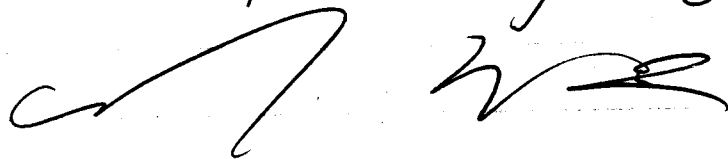
3. CAN YOU PLEASE KINDLY STAMP  
the extra copies AND MAIL

PAGE 2 OF 2

them back to me in the  
provided self Addressed  
STAMP envelope?

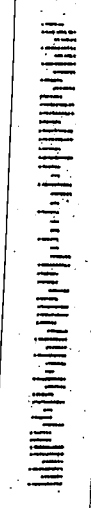
Respectfully Requested

8-06-15



George Cleveland ~~JH~~ #357770  
MACDOUGALL CORRECTIONAL INST  
1516 OLD GILLIARD ROAD  
RIDGEVILLE, SC 29172

See [redacted]



BS7778, M2-C5-A

MacDougall Correctional Inst  
1516 Old Sillards Road  
Ridgeville S.C. 29472

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AUG 06 2015

MacDougall Corr. Inst.  
Mailroom

The South Carolina Court of Appeals  
Terry Abbott Kitchings Clerk  
P.O. Box 11629  
Columbia SC 29211

Legal-Mail



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AUG 10 2015

SC Court of Appeals