

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE  
ADMINISTRATIVE LAW COURT  
John D. McLeod, Administrative Law Judge  
Case No.: 14-ALJ-22-454-AP

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**RECEIVED**  
OCT 20 2015  
SC Court of Appeals

Appellate Case No. 2015-001490

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Charles E. Stubbs,

Appellant,

v.

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

Respondents,

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**NOTICE OF APPEARANCE**

**and**

**RESPONDENT'S REQUEST FOR EXTENSION OF TIME  
TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER**

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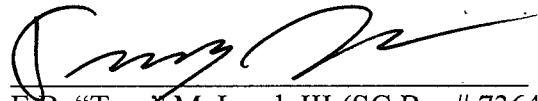
Respondent, the South Carolina Department of Employment and Workforce (DEW), hereby submits this notice of appearance for Counsel Debra S. Tedeschi and E.B. "Trey" McLeod, III to represent DEW in this appeal, in addition to current counsel, Maura Dawson Baker.

DEW also respectfully requests a 30-day extension to file Respondent's Initial Brief and Designation of Matter. Counsel's competing workload responsibilities and work-related out-of-state travel have contributed to the need for this extension. This is DEW's first request for an extension.

On October 15, 2015, Respondent's counsel consulted with counsel for Appellant, Jack Cohoon, via electronic mail; Mr. Cohoon graciously consented to Respondent's extension request.

Accordingly, Respondent asks the Court to grant a 30-day extension of time to DEW to file Respondent's Initial Brief and Designation of Matter.

Respectfully submitted,



E.B. "Trey" McLeod, III (SC Bar # 73642)  
Assistant General Counsel  
Debra S. Tedeschi (SC Bar # 15307)  
Deputy General Counsel  
Maura Dawson Baker (SC Bar #73726)  
Assistant General Counsel  
S.C. Dept. of Employment & Workforce  
Post Office Box 8597  
Columbia, SC 29202  
(803) 737-2666  
[legal@dew.sc.gov](mailto:legal@dew.sc.gov)

October 19, 2015

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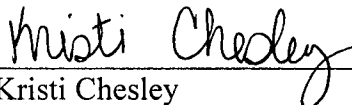
**PROOF OF SERVICE**

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I certify that I have served Respondent's **Notice of Appearance and Request for Extension of Time to File Initial Brief and Designation of Matter** on all parties in this action by depositing a copy of it in the United States Mail, first class postage prepaid, on October 19, 2015, to the following addresses:

Jack E. Cohoon, Esq.  
P.O. Box 1445  
Columbia, SC 29201  
Attorney for Appellant

JSE, LLC  
1410 Colonial Blvd West, Ste. 230  
Columbia, SC 29210  
Employer-Defendant

  
\_\_\_\_\_  
Kristi Chesley  
S.C. Dept. of Employment & Workforce  
Post Office Box 8597  
Columbia, SC 29202  
(803) 737-2666  
[legal@dew.sc.gov](mailto:legal@dew.sc.gov)

October 19, 2015

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OCT 20 2015

SC Court of Appeals

P.O. Box 995  
1550 Gadsden Street  
Columbia, SC 29202  
dew.sc.gov



Nikki R. Haley  
Governor

Cheryl M. Stanton  
Executive Director

Post Office Box 8597  
Columbia, SC 29202  
Telephone: (803) 737-0395  
Fax: (803) 737-0124  
October 19, 2015

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OCT 20 2015

SC Court of Appeals

The Honorable Jenny Abbot Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Charles E. Stubbs v. SCDEW and JSE LLC  
Appellate Case No: 2015-001490

Dear Ms. Kitchings:

Enclosed are an original and six copies of Respondent's Notice of Appearance and Request for Extension of Time to File Initial Brief and Designation of Matter. Also enclosed is a Proof of Service to the other parties.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Kristi Chesley".

Kristi Chesley  
Administrative Legal Assistant for  
Trey McLeod  
Assistant General Counsel

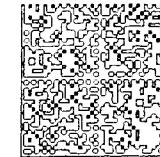
**SOUTH CAROLINA**

**DEPARTMENT OF EMPLOYMENT AND WORKFORCE**

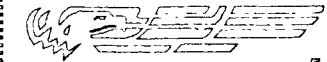
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