

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.

MOTION TO ENLARGE TIME TO FILE REPLY BRIEF

Respondent South Carolina Department of Employment and Workforce filed its Initial Respondent's Brief on November 25, 2015. Appellant's counsel's time to prepare a Reply brief has been limited due to professional obligations, including presenting at a conference, as well as travel for Thanksgiving. Appellant's counsel respectfully requests a twenty (20) day extension of time to file the Reply brief to adequately address the issues raised by the Respondent. Respondent's counsel has graciously consented to this request. The new deadline would be December 15, 2015.

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.

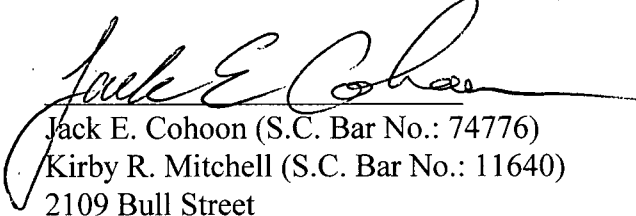
December 7, 2015

Columbia, S.C.

(signature is on the following page)

RECEIVED
DEC 07 2015
SC Court of Appeals

SOUTH CAROLINA LEGAL SERVICES

A handwritten signature in black ink, reading "Jack E. Cohoon", is written over the printed name and bar number.

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

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

DEC 07 2015

APPEAL FROM THE ADMINISTRATIVE LAW COURT

SC Court of Appeals

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.

PROOF OF SERVICE

I certify that I have served the *Motion to Enlarge Time for Filing of Reply Brief* 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 December 7, 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



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

www.sclegal.org | www.lawhelp.org/sc | www.probono.net/sc

December 7, 2015

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

RECEIVED
DEC 07 2015
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 Reply Brief 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

