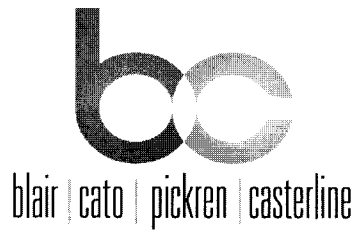


KRISTINE L. CATO
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MEMBER



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CERTIFIED EMPLOYMENT
LAW SPECIALIST

January 14, 2016

V. Claire Allen
Deputy Clerk, Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
JAN 15 2016
SC Court of Appeals

RE: Billie Mueller v. South Carolina Department of Employment and Workforce and Ebtron,
Inc.
Appellate Case No.: 2014-002489

Dear Ms. Allen:

Thank you for speaking with me yesterday to clarify some concerns and confusion that Sandra Grooms and I have had regarding your letter of January 12, 2016, instructing Respondents' counsel to submit Ebtron's and the South Carolina Department of Employment and Workforce's Initial Brief and Designation of Matter within 10 days.

As you know, this matter has been fraught with deficiencies by Appellant in her filings. She has made numerous attempts to file Briefs and Designations of Matter, all of which have been determined by the Court to be deficient. As a result, both Respondents were unaware that any time had been triggered requiring Respondents to file their Initial Brief and Designation of Matter.

I understand now from our conversation that the Court determined that Appellant's filing of her third Initial Brief and Designation of Matter on December 3, 2015 triggered Respondents' 30-day period in which to respond, even though, again, that filing was deemed deficient by the Court.

Respondents respectfully request a 30-day extension in which to file their Initial Brief and Designation of Matter, resulting in a February 12, 2016 due date. Respondents have timely and properly filed all other required filings with the Court. Such an extension will not prejudice Appellant in any way, but a rejection of such an extension would greatly prejudice Respondents, as it would provide them less than the 30 days normally allowed, and indeed, even less than the 10 days identified in the letter sent by the Court.

Thank you so much for your consideration.

Very truly yours,

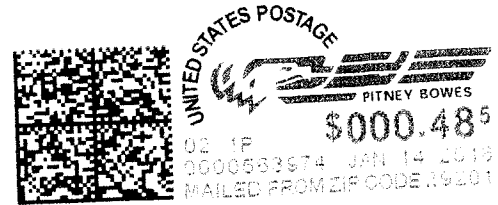
BLAIR CATO PICKREN CASTELINE, LLC


Kristine L. Cato

cc: Sandra Grooms, Esquire
Billie Mueller

bc
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