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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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FEB 03 2016

APPEAL FROM SUMTER COUNTY
Court of Common Pleas
Honorable G. Thomas Cooper, Circuit Court Judge

SC Court of Appeals

Case No: 2015-002387

David Johnson.....Appellant

v.

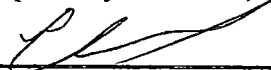
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South Carolina
.....Respondent

MOTION TO REQUEST EXTENSION

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 20-day extension of time to file the Appellant's Initial Brief and Record on Appeal. This request is made as a result that the Appellant's Counsel is presently experiencing a significant case-load including several upcoming trials and jury trials which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation.

For the reason set forth herein, counsel for the Appellant submits that good cause has been shown why the time limits prescribed by the Rules should be changed and the Appellant be given an additional twenty (20) day period with which to file any objections to the Brief and Record on Appeal.

Respectfully Submitted,



Charles T. Brooks, III /Bar ID#11762
309 Broad Street
Post Office Box 3512
Sumter, SC 29151
(803) 418-5708

Sumter, SC
February 2, 2016

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South CarolinaRespondent

PROOF OF SERVICE

I, the undersigned, do hereby certify that on this February 2, 2016, I served the foregoing **Motion to Request Extension** as well as **Proof of Service** in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on February 2, 2016, addressed to the following as indicated below:

Office of SC Attorney General
ATTN: Courtney E. Lowell
Post Office Box 11549
Columbia, South Carolina 29211

SLED
Adam L. Whitsett, Esq.
Post Office Box 21398
Columbia, South Carolina 29221-1398

Dated: February 2, 2016



Charles T. Brooks, III
Attorney for the Appellant
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Sumter, South Carolina 29150
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South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

RE: Johnson vs. Mark Keel, Chief of the South Carolina Law Enforcement Division,
et al
Appellate Case No.: 2015-002387

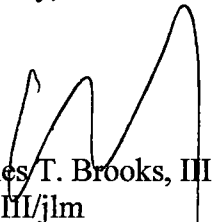
Dear Ms. Kitchings:

Please find enclosed herewith the Appellant's Motion to Request Extension with reference to the above case. I have also provided the necessary copies and filing fees for this Motion. Please return the filed copy(ies) to my attention in the provided return envelope.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,


Charles T. Brooks, III
CTB,III/jlm

Enclosed as stated

cc: Adam L. Whitsett, SLED
Courtney Lowell, SCAG

The Brooks Law Offices, LLC
309 Broad Street
Post Office Box 3512
Sumter, South Carolina 29150

COLUMBIA S
02 FEB 2016



South Carolina Court of Appeals
Jenny Abbott Kitchings
Post Office Box 11629
Columbia, South Carolina 29211

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