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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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FEB 04 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable Tanya A. Gee, Circuit Court Judge

Case No: 2015-002240

Edward L. Green.....Appellant

v.

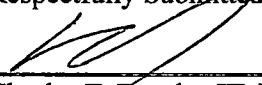
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South
CarolinaRespondent

MOTION TO REQUEST EXTENSION

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 30-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 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 thirty (30) 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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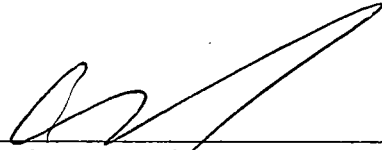
PROOF OF SERVICE

I, the undersigned, do hereby certify that on this February 2, 2016, I served the
foregoing **Motion for 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
309 Broad Street
Sumter, South Carolina 29150
(803) 418-5708

The Brooks Law Office, LLC

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SC Court of Appeals

February 2, 2016

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

RE: Green vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al
Appellate Case No.: 2015-002240

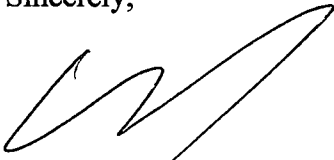
Dear Ms. Kitchings:

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 Whitsett, SLED
Courtney Lowell, SCAG Office

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



SPS

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