

**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

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

\_\_\_\_\_  
Case No: 2015-002387  
\_\_\_\_\_

David Johnson.....Appellant

v.

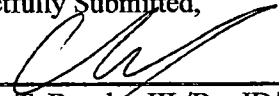
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South Carolina  
.....Respondent

\_\_\_\_\_  
**AMENDED 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 and jury trials which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation. Opposing counsel in this matter has indicated that they have no objection to this Extension.

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 10, 2016

**RECEIVED**  
FEB 12 2016  
SC Court of Appeals

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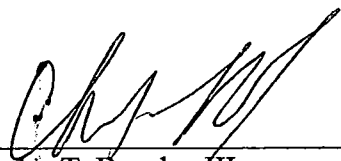
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**PROOF OF SERVICE**

I, the undersigned, do hereby certify that on this February 10, 2016, I served the foregoing **Amended 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 10, 2016, addressed to the following as indicated below:

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

Dated: February 10, 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 10, 2016

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:

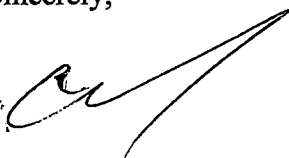
Please find enclosed herewith the Appellant's Amended Motion to Request Extension with reference to the above case. Opposing Counsel in this matter has indicated that he has no objection to my receipt of an extension in this matter.

I request that my previously paid filing fee for the original Motion for Extension be applied to this Amended 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,



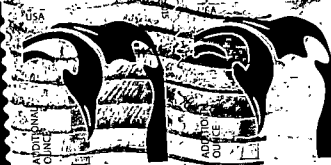
Charles T. Brooks, III

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



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**SC Court of Appeals**

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