

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from the Administrative Law Court
Deborah B. Durden, Administrative Law Judge
Case No. 15-ALJ-15-0003-AP

RECEIVED

FEB 11 2016

SC Court of Appeals

Appellate Case No. 2015-000478

BERNARD BAGLEY, #175851,

APPELLANT

v.

SOUTH CAROLINA DEPARTMENT OF PROBATION,
PAROLE AND PARDON SERVICES,

RESPONDENT

MOTION FOR LEAVE TO FILE
BRIEF AMICUS CURIAE OF APPELLANT

PLEASE TAKE NOTICE, my name is Demetria D. Moore, I'm the eldest daughter, and power-of-attorney of Bernard Bagley, #175851, the Appellant in the above-entitled matter. I'm a layperson, and I'm in no way attempting to practice law without a license, nor am I an attorney at law. I'm just respectfully requesting permission to file an Amicus Brief on behalf of my Father to adequately respond to four (4) issues raised in the Final Brief of Respondent dated July 20, 2015. In addition, I desire to conditionally file the Brief with this Motion for Leave to File.

Respectfully submitted,



Demetria D. Moore
4318 Park Road
Ridgeway, SC 29130

February 10, 2016

Layperson

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Appellate Case No. 2015-000478

Bernard Bagley, #175851,

Appellant

v.

South Carolina Department of Probation,
Parole and Pardon Services,

Respondent.

CERTIFICATE OF SERVICE

I, Demetria D. Moore, a layperson, hereby certify that I have served the within Motion for Leave to File Brief Amicus Curiae of Appellant dated February 10, 2016, on Respondent this 10th day of February, 2016, by depositing a copy of the same in the U.S. Mail, postage prepaid, addressed

to: Tommy Evans, Jr.,
SCDPPPS Assistant General Counsel
P.O. Box 50666
Columbia, SC 29250

Bernard Bagley
#175851/HD133/KER.CI
4848 Goldmine Hwy.
Kershaw, SC 29067

I further certify that all parties required by Rule to be served have been served.

s/ *Demetria D. Moore*
Demetria D. Moore
4318 Park Road
Ridgeway, SC 29130

Layperson

February 10, 2016

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SC Court of Appeals

Demetria D. Moore
4318 Park Road
Ridgeway, SC 29130

The Honorable Jenny Kitchings,
Clerk of Court S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Amicus Curiae Brief of Appellant, Bagley v. SCDPPPS(2), 2015-000478

Dear Mrs. Kitchings:

Enclosed is my Motion for Leave to File Brief Amicus Brief in the above-entitled case, and the brief to be conditionally filed as well.

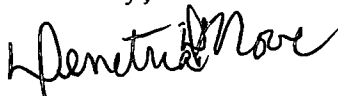
Please note that I'm a layperson and in no way trying to practice law without a license. The brief is on behalf of my Daddy Bernard Bagley.

I'm respectfully requesting that you allow me or authorize that the rules be laxed regarding the number of copies to be file with the Court, along with the filing fee that maybe associated with submitting this Motion for Leave.

The brief does not contain no irrelevant arguments, but in an effort to articulate what my Father wanted to convey and perhaps provide an insight of what believe is required.

Thank you. If you need any further information contact me at the address listed above.

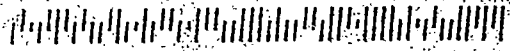
Sincerely,



Demetria D. Moore

cc: Bernard Bagley, #175851
Tommy Evans, Jr., SCDPPPS

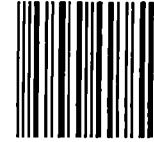
Enclosures



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1848 Goldmine Hwy
Kershaw, SC 29067



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