

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

John D. McLeod, Administrative Law Judge

Case No. 14-ALJ-22-454-AP

RECEIVED
FEB 03 2016
SC Court of Appeals

Charles E. Stubbs,

Appellant,

v.

South Carolina Department of
Employment and Workforce and
JSE LLC,

Respondents.

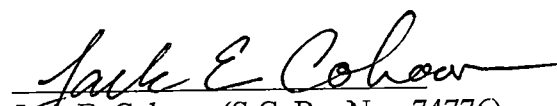
MOTION FOR ORAL ARGUMENT

Appellant Charles E. Stubbs respectfully moves that the Court grant oral argument in this case pursuant to Rule 215 SCACR. The amount of unemployment benefits involved exceeds \$1,000. The primary issue in this case is one of significant public policy—whether parties appealing adverse unemployment benefit claims decisions to the Appellate Panel may do so within ten calendar days after the date of notification, pursuant to S.C. Code Ann. Regs. 47-52(A)(1). Moreover, the case involves the constitutional question of whether the right to due process guaranteed by both the U.S. and South Carolina Constitutions requires that the deadline to appeal take into account date of notification rather than simply date of mailing. S.C. Const. art. I, § 3, and U.S. Const. amend. XIV, § 1.

(signature is on the following page)

WE SO MOVE:

SOUTH CAROLINA LEGAL SERVICES



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February 3, 2016

Columbia, S.C.

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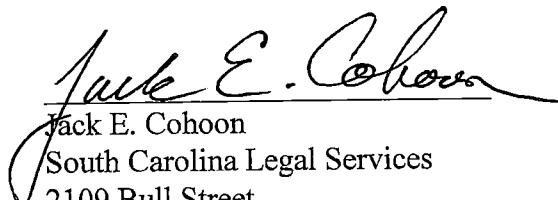
Respondents.

PROOF OF SERVICE

I certify that I have served the *Motion for Oral Argument* on Respondents S.C. Department of Employment and Workforce and JSE LLC by depositing a copy of them in the United States mail, postage prepaid, on February 3, 2016, addressed to their counsel of record or designated representative as follows:

Debra S. Tedeschi, Esq.
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S.C. Dept. Employment and Workforce
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