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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

MAR 18 2016

SC Court of Appeals

The Honorable Deborah Brooks Durden
Administrative Law Judge

Appellate Case No. 2016-000225

Docket No. 15-ALJ-15-0033-AP

DAVID ROSE, #91858,.....Respondent,

v.

SOUTH CAROLINA DEPARTMENT OF
PROBATION, PAROLE AND PARDON SERVICES,....Appellant.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE
INITIAL BRIEF OF RESPONDENT

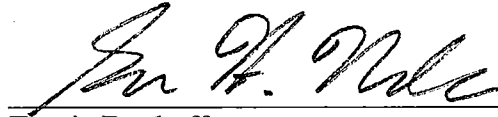
Pursuant to Rule 208(a)(2) and Rule 240 of the South Carolina Appellate Court Rules, Respondent David Lee Rose requests a 30-day extension of time to file his Initial Response Brief in the South Carolina Court of Appeals, and asks that the current deadline be held in abeyance until the Court considers this motion.

The South Carolina Department of Probation, Parole, and Pardon Services ("DPPP") served the Appellant's Initial Brief and Designation of Matter on March 4, 2016. Rose's Initial Response Brief is, therefore, currently due on April 4, 2016. This request would make the new deadline for filing Respondent's Initial Brief May 4, 2016.

This extension is necessary due to the undersigned counsel's other court deadlines, including a trial the week of March 21st and an appellate brief due April 8th on another matter.

Counsel for DPPP has kindly consented to this request for an extension. (See attached).

Respectfully submitted,



Travis Dayhuff
Susan Hills Nelson
Susannah Knox
Nelson Mullins Riley and Scarborough, LLP
1320 Main Street - 17th Floor (29201)
Post Office Box 11070
Columbia, SC 29211-1070
(803) 799-2000

Attorneys for Appellant

March 18, 2016

Columbia, South Carolina

Susan Nelson

From: Dawn K. Nichols <Dawn.Nichols@ppp.sc.gov>
Sent: Friday, March 18, 2016 10:56 AM
To: Susan Nelson
Cc: Legals
Subject: David Rose - request for extension - 33999/01227

Good morning Ms. Nelson, please be advised that we consent to the extension request to file your reply brief in the above referenced case. Thank you.

Dawn Nichols, Executive Administrative Assistant
Division of Legal Services and Policy
S.C. Department of Probation, Parole and Pardon Services
P.O. Box 50666
Columbia, S.C. 29250
Office- (803) 734-9051
Fax- (803) 734-9324

CERTIFICATE OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant David Lee Rose, #91858, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings:

Consent Motion for Extension of Time to File Initial Brief of Respondent

Counsel Served:

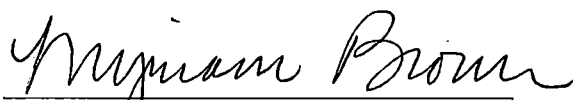
Hand Delivery

Matthew C. Buchanan, Esq.
Tommy Evans, Jr., Esq.
South Carolina Department of Probation,
Parole, & Pardon Services
2221 Devine Street, Suite 600
Post Office Box 50666
Columbia, SC 29250

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SC Court of Appeals



Myriam Brown
Administrative Assistant

March 18, 2016

Nelson Mullins

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MAR 18 2016

Susan H. Nelson
Tel: 803.255.9476
susan.nelson@nelsonmullins.com

SC Court of Appeals

March 18, 2016

Hand Delivered

The Honorable Jenny Abbott Kitchings
Clerk of Court
SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

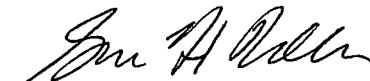
RE: David Lee Rose #91858 - Appeal of 2001 Parole Hearing
Appellate Case No. 2016-000225
Our File No. 33999/01227

Dear Ms. Kitchings:

Enclosed are the original and seven copies of Consent Motion for Extension of Time to File Initial Brief of Respondent, along with our check in the amount of \$25.00. Please file the requisite number of copies and return one file stamped copy to our office via our courier.

By copy of this letter to opposing counsel, we are hereby serving them with a copy of this Motion.

Very truly yours,



Susan H. Nelson

SHN:myb

cc: Matthew C. Buchannan, Esq. (via hand delivery)
Tommy Evans, Jr., Esquire (via hand delivery)