



South Carolina
Department of Labor, Licensing and Regulation

Office of Advice Counsel



Nikki R. Haley
Governor

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Director

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RECEIVED

April 15, 2016

APR 18 2016

SC Court of Appeals

Jenny Abbott Kitchings
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RE: Nancy C. Perez, Petitioner, v. South Carolina Department of Labor, Licensing and Regulation—Board of Nursing, Case No. 2014-CP-04-01780

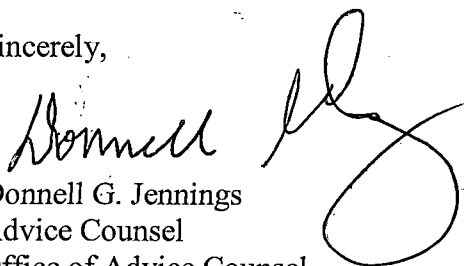
Dear Ms. Kitchings:

Yesterday, our office filed the attached motion for an extension of time to file the Respondent's initial brief because we need the hearing transcript.

After the motion was filed, I discovered we erroneously used the date of our receipt of Appellant's filings when stating the date she mailed them. Ms. Perez mailed Appellant's Initial Brief on March 21, 2016, and mailed Appellant's Designation of Matter to Be Included in the Record on Appeal on March 24, 2016. This error does not affect our reason for seeking the extension, but I wanted to promptly bring our error to the attention of the Court and the Appellant.

I sincerely apologize for the error.

Sincerely,

 by Katherine B. Banse

Donnell G. Jennings
Advice Counsel
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SC Department of Labor, Licensing and Regulation
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Attorney for Respondent

cc: Nancy C. Perez



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April 13, 2016

Renee H. Tollison
Post Office Box 4321
Anderson, South Carolina 29622

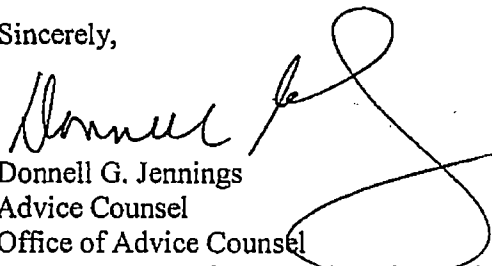
RE: Nancy C. Perez, Petitioner, v. South Carolina Department of Labor, Licensing and Regulation—Board of Nursing, Case No. 2014-CP-04-01780

Dear Ms. Tollison:

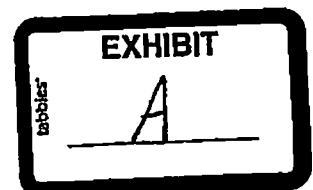
On July 27, 2015, Respondent's Opposition to Pro Se Petition for Writ of Mandamus and Cross Motion to Dismiss Case in the above matter was heard before the Honorable R. Scott Sprouse, Circuit Court Judge, in Anderson County. My records indicate that you were the court reporter for that hearing.

I request that you provide me with a transcript of that proceeding. Please transcribe the entire record. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely,


Donnell G. Jennings
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Attorney for Respondent

cc: Nancy C. Perez
S.C. Court Administration
Clerk, Court of Appeals



THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Nancy C. Perez, Appellant,

v.

South South Carolina Department of Labor, Licensing
and Regulation, Board of Nursing, Respondent.

Appellate Case No.: 2016-000562


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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Respondent's Motion for Extension of Time to File Respondent's Initial Brief by depositing a copy of it in the United States mail, postage prepaid, on April 14, 2016, addressed to:

Nancy C. Perez
713 E. Greenville Street, #D220
Anderson, SC 29621
(864) 209-1509

April 14, 2016



Donnell G. Jennings
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Attorney for Respondent

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 14 2016

APPEAL FROM ANDERSON COUNTY, SOUTH CAROLINA
Court of Common Pleas

SC Court of Appeals

The Honorable R. Scott Sprouse, Circuit Court Judge

Appellate Case No.: 2016-000562
Lower Court Order No.: 2014-CP-04-01780

Nancy C. Perez,

Appellant,

v.

South Carolina Department of Labor, Licensing
and Regulation, Board of Nursing,

Respondent.

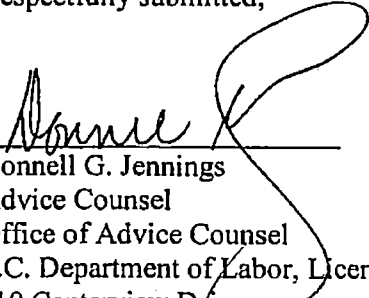
**MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S INITIAL
BRIEF**

Pursuant to SCACR Rule 240, Respondent South Carolina Department of Labor, Licensing and Regulation, Board of Nursing requests an extension of time to file its initial brief until 30 days after receipt of the transcript of the trial court's hearing on Respondent's motion to dismiss. The *pro se* Appellant mailed her initial brief on March 24, 2016, only two weeks after mailing the Notice of Appeal. Appellant did not include any portion of the transcript in Appellant's Designation of Matter to be Included in the Record on Appeal, which Appellant mailed on March 28, 2016.

Respondent needs the transcript of the hearing to prepare its initial brief and Respondent's Designation of Matter to be Included in the Record on Appeal.

A copy of Respondent's written request to the court reporter for the hearing transcript is attached hereto as Exhibit A.

Respectfully submitted,



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CONFIDENTIAL

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04/15/2016

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