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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ADMINISTRATIVE LAW COURT
Court of Common Pleas

S. Phillip Lenski, Administrative Law Judge

Case No. 15-ALJ-15-0015-AP

RECEIVED
JUL 25 2016
SC Court of Appeals

Tony Moore, Jr., #188313

Appellant,

v.

South Carolina Department of Probation,
Parole and Pardon Services,

Respondents.

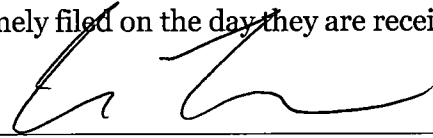
**MOTION FOR LEAVE TO FILE INITIAL BRIEF AND DESIGNATION OF MATTER
OUT OF TIME**

Appellant Tony Moore, Jr., through his undersigned counsel, respectfully requests this Honorable Court allow him to file the *Reply Brief of Appellant* outside of the Court's deadlines for the following reasons.

Counsel's current caseload prevented him from filing this matter on time. Based on another appeal in this Court, and court appearances that took more time and preparation than expected, counsel was unable to complete the reply brief prior to the deadline. However, the brief is now completed and the short delay in its filing should not prejudice either party nor create any additional work for the Court.

Because of the small delay, which counsel believes is reasonable and excusable, as well as the important appellate rights at stake in this case, Appellant and the undersigned counsel

respectfully pray this Honorable Court grant leave to file the *Initial Reply Brief of Appellant* outside of the Court's deadline and consider them timely filed on the day they are received.



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July 25, 2016

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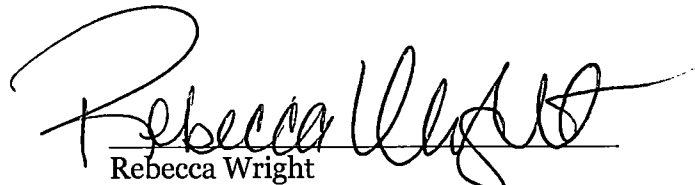
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Respondents.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that the attached *Initial Reply Brief* and *Motion for Leave to File Out of Time* has been served on the opposing counsel, via United States Postal Service at the following address, this 25th day of July, 2016:

Tommy Evans
2221 Devine St, Suite 600
Columbia, SC 29250


Rebecca Wright
Paralegal

July 25, 2016