

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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SEP 12 2016  
SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

Appellate Case No. 2016-000285  
Administrative Law Court Docket No. 12-ALJ-04-00143-AP

Thomas J. Torrence, #094651 ..... Respondent,

v.

South Carolina Department of Corrections ..... Appellant.

**APPELLANT'S SECOND MOTION FOR AN EXTENSION OF THE  
DEADLINE BY WHICH IT MAY FILE ITS REPLY BRIEF**

By an order issued August 29, 2016, this Court granted a motion filed by the undersigned counsel for the Appellant, the South Carolina Department of Corrections ["SCDC"], to extend the deadline to file and serve SCDC initial reply brief until September 12, 2016.

For the reasons stated below, SCDC, by and through its undersigned counsel, again respectfully moves the Court for an extension of the deadline by which it may file its reply brief in the instant matter. Specifically, SCDC's undersigned counsel now respectfully moves this Court for an extension of the deadline by which SCDC must file and serve its initial reply brief from Monday, September 12, 2016 to Monday, September 26, 2016.

SCDC's undersigned counsel so moves in light of deadlines he has recently confronted in other matters pending before both our Supreme Court and this Court since this Court issued its August 29, 2016 order.

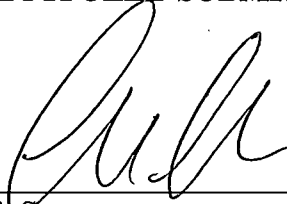
In the matter pending before our Supreme Court and styled as *Fred Gatewood v. S.C. Dep't of Corr.*, Appellate Case No. 2016-001221, SCDC's undersigned counsel, who also represents SCDC in *Gatewood*, filed and served SCDC's reply to Gatewood's return to SCDC's petition for writ of certiorari on September 2, 2016. In the matter pending before this Court and styled as *Joshua Cramer v. S.C. Dep't of Corr.*, Appellate Case No. 2014-002172, SCDC's undersigned counsel, who also represents SCDC in *Cramer*, filed and served SCDC's petition for rehearing on Tuesday, September 6, 2016.

SCDC's undersigned counsel also so moves in light of obligations he confronts in other cases, namely *Oliver v. University of South Carolina, et al.*, 2015-CP-40-3502, a matter pending in circuit court in which he represents the defendants. Specifically, a dispute concerning the admissibility of evidence generated during the course of discovery activity in *Oliver* has recently manifested itself, and this dispute may result in one of the defendants in *Oliver* filing a motion with this Court.

Finally, SCDC's undersigned counsel so moves in light of recent obligations he confronted in representing a client under investigation by state law enforcement authorities, as well as a matter in which he continues to provide advice to a corporate client involved in a dispute impacting its day-to-day operations.

For these reasons, SCDC's undersigned counsel again respectfully urges this Court to grant his instant motion, and, accordingly, SCDC's undersigned counsel respectfully urges this Court to extend the deadline by which SCDC may file and serve its reply brief until Monday, September 26, 2016.

**RESPECTFULLY SUBMITTED:**



September 12, 2016

Lake E. Summers

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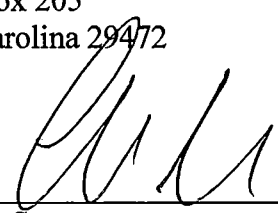
South Carolina Department of Corrections ..... Appellant.

**PROOF OF SERVICE**

I certify that I have served the APPELLANT'S SECOND MOTION FOR AN EXTENSION OF THE DEADLINE BY WHICH IT MAY FILE AND SERVE ITS REPLY BRIEF on the above named *pro se* Respondent by mailing a copy to him, first class postage pre-paid, at the following address:

Thomas J. Torrence  
#094651  
Lieber Correctional Institution  
Post Office Box 205  
Ridgeville, South Carolina 29472

September 12, 2016



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Lake E. Summers