

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Tanya A. Gee, Circuit Court Judge

Case No. 2015-CP-40-3381

RECEIVED
OCT 11 2016
SC Court of Appeals

Terry Douglas Campbell, Appellant,

v.

The State of South Carolina, Director of South Carolina
Department of Corrections, Bryan Stirling, Warden Bernard McKie,
Officers Lt. McLaughlin and Aubrey Pounds, Respondents.

**MOTION FOR EXTENSION
TO FILE INITIAL BRIEF OF RESPONDENTS**

Respondents the State of South Carolina, Director of South Carolina
Department of Corrections, Bryan Stirling, Warden Bernard McKie, Officers Lt.
McLaughlin and Aubrey Pounds respectfully move this Court for an additional
extension of time until November 7, 2016, by which to file and serve their Initial
Brief and Designation of Matter to be Included in the Record on Appeal.

Respondents' motion is based on the following grounds:

1. The Initial Brief of the Respondents is currently due to be filed and served on October 7, 2016.

2. Counsel for the Respondents has not yet received a copy of the transcript of the motion hearing, which is needed to prepare the Initial Brief of Respondents. Undersigned counsel waited until the transcript was received by the Appellant before requesting a copy of same so as not to incur unnecessary expense to Respondents in the event the appeal was not properly pursued. Based on the date of Respondents' request, the transcript is due on or before October 31, 2016.

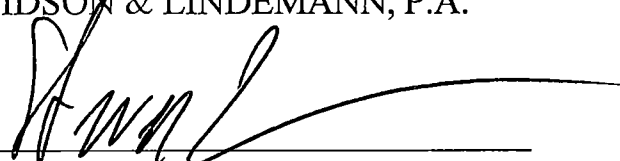
WHEREFORE, Respondents the State of South Carolina, Director of South Carolina Department of Corrections, Bryan Stirling, Warden Bernard McKie, Officers Lt. McLaughlin and Aubrey Pounds respectfully request that they be allowed until November 7, 2016, by which to file and serve their Initial Brief and Designation of Matter to be Included in the Record on Appeal.

[Signature block to follow]

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

BY:



DANIEL C. PLYLER

STEVEN S. SPREEUWERS

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Counsel for Respondents

Columbia, South Carolina

October 6, 2016

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In The Court of Appeals

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Terry Douglas Campbell, Appellant,

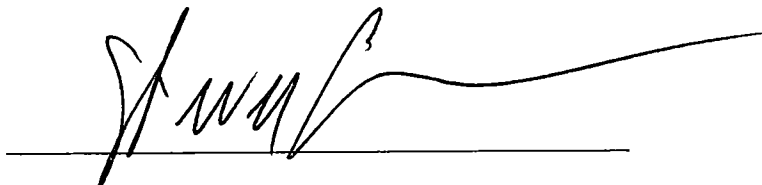
v.

The State of South Carolina, Director of South Carolina
Department of Corrections, Bryan Stirling, Warden Bernard McKie,
Officers Lt. McLaughlin and Aubrey Pounds, Respondents.

CERTIFICATE OF SERVICE

Respondents the State of South Carolina, Director of South Carolina Department of Corrections, Bryan Stirling, Warden Bernard McKie, Officers Lt. McLaughlin and Aubrey Pounds, does hereby certify that service of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above-captioned matter was made upon Appellant by placing a copy in the United States Mail, first class postage prepaid, with the below listed address clearly indicated on said envelope this the 6th day of October 2016:

Terry Douglas Campbell, #281286
Catawba Pre-Release
1030 Milling Road
Rock Hill, South Carolina 29730



A handwritten signature in black ink, appearing to read "Terry Douglas Campbell", is written over a horizontal line. The signature is stylized and cursive, with a long, sweeping underline that extends to the right.

DAVIDSON & LINDEMANN, P.A.

ATTORNEYS AND COUNSELLORS AT LAW

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*Also Admitted In North Carolina
†Certified Mediator

Of Counsel
Kenneth P. Woodington

October 6, 2016

Writer's Email: sspreeuwers@dml-law.com

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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OCT 11 2016

SC Court of Appeals

RE: Terry Douglas Campbell, Appellant, v. The State of South Carolina, Director of South Carolina Department of Corrections, Bryan Stirling, Warden Bernard McKie, Officers Lt. McLaughlin and Aubrey Pounds, Respondents.
Appellate Case Number: 2016-000066
Civil Action Number: 2015-CP-40-3381
Our File Number: 103.9744

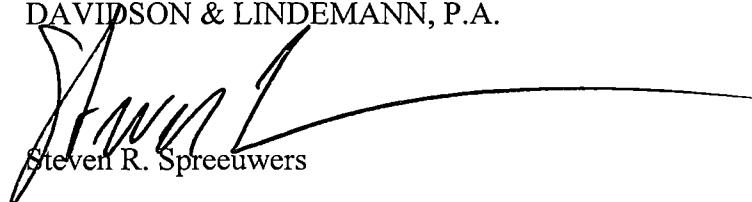
Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion for Extension of Time to File Initial Brief of Respondents** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. Pursuant to Rule 240(d), SCACR, I have not enclosed a filing fee.

By copy of this letter, I am serving a copy on the Appellant. Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Steven R. Spreeuwers

SRS/ldrt
Enclosure

✓

The Honorable Jenny Abbott Kitchings

October 6, 2016

Page 2

cc: (with Enclosure)

Terry Douglas Campbell, #281286

Catawba Pre-Release

1030 Milling Road

Rock Hill, South Carolina 29730



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SC Court of Appeals

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Post Office Box 8568
Columbia, South Carolina 29202-8568



The Honorable Jenny Abbott Kitchings
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