

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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OCT 18 2016

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable Jean Toal, Circuit Court Judge

Case No: 2016-002018

Fred S. Davis.....Appellant

v.

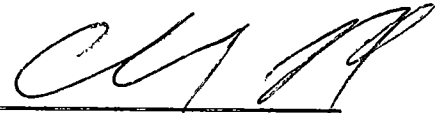
Mark Keel, Director of the South Carolina Law Enforcement Division and the State of South
CarolinaRespondent

MOTION TO REQUEST EXTENSION

The above-named Appellants, by and through their undersigned counsel, do hereby respectfully moves this Court to hereby request a 30-day extension of time to file the Appellant's Initial Brief and Designation of Matter to be Included in Record on Appeal. This request is made as a result that the Appellant's Counsel having recently received the Transcript in this matter is presently experiencing a significant case-load including several upcoming trials as well as upcoming arguments in this Court which require Counsel's immediate attention and the additional time will give Counsel the ability to appropriately prepare the required documentation.

For the reason set forth herein, counsel for the Appellant submits that good cause has been shown why the time limits prescribed by the Rules should be changed and the Appellant be given an additional thirty (30) day period with which to file any objections to the Brief and Record on Appeal.

Respectfully Submitted,



Charles T. Brooks, III / Bar ID#11762
309 Broad Street
Post Office Box 3512
Sumter, SC 29151
(803) 418-5708

Sumter, SC
October 17, 2016

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PROOF OF SERVICE

I, the undersigned, do hereby certify that on this October 17, 2016, I served the foregoing **Motion for Extension** as well as **Proof of Service** in this matter by depositing a true copy of it in the United States Mail, postage prepaid, on Mark Keel, Director of the South Carolina Law Enforcement Division (SLED) by personally depositing a copy of it in the United States Mail, postage prepaid, on October 17, 2016, addressed to his attorney of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221-1398 and on The State of South Carolina by personally depositing a copy of it in the United States Mail, postage prepaid, on October 17, 2016, addressed to their attorney of record, T. Parkin C. Hunter, Office of South Carolina Attorney General, Post Office Box 11549, Columbia, South Carolina 29211

Dated: October 17, 2016



Charles T. Brooks, III
Attorney for the Appellant
309 Broad Street
Sumter, South Carolina 29150
(803) 418-5708

The Brooks Law Office, LLC

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SC Court of Appeals

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

RE: Davis vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al
2016-002018

Dear Ms. Kitchings;

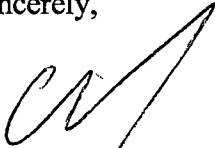
Please find enclosed herewith the original and six (6) copies of the Motion for Extension with reference to the above matter, which I hereby submit for filing at this time. In addition, I have enclosed the required fee for the filing of this Motion with the Courts.

Please return any unused copies to my attention in the provided self-addressed stamped envelope.

If there are any questions, please feel free to give me a call.

With kind regards,

Sincerely,

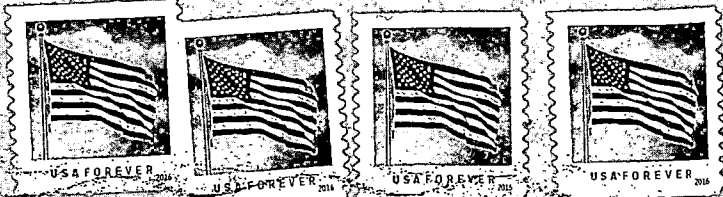


Charles T. Brooks, III
CTB,III/jlm

Enclosures as stated

cc: Adam L. Whitsett, SLED
T. Parkin C. Hunter, SCAG Office

✓



COLUMBIA SC 292
MON 17 OCT 2016 PM

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