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**THE STATE OF SOUTH CAROLINA**

**In the Court of Appeals**

**RECEIVED**

JAN 23 2017

**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.

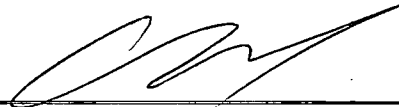
Mark Keel, Director of the South Carolina Law Enforcement Division and the State of South  
Carolina .....Respondent

**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 Record on Appeal. This request is made as a result that the Appellant's Counsel 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,



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

Sumter, SC  
January 18, 2017

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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

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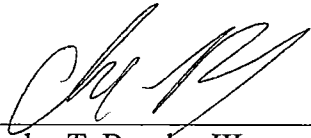
Mark Keel, Director of the South Carolina Law Enforcement Division and the State of  
South Carolina .....Respondent

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**PROOF OF SERVICE**

I, the undersigned, do hereby certify that on this January 20, 2017, 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 January 20, 2017, 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 January 20, 2017, 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: January 20, 2017

  
\_\_\_\_\_  
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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January 20, 2017

JAN 23 2017

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;

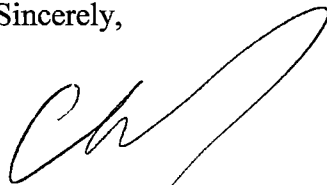
Please find enclosed herewith the original and six (6) copies of the Motion for Extension with reference to the above matter, which I hereby submit for filing at this time. In addition, I have enclosed the required fee for the filing of this Motion with the Courts.

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,



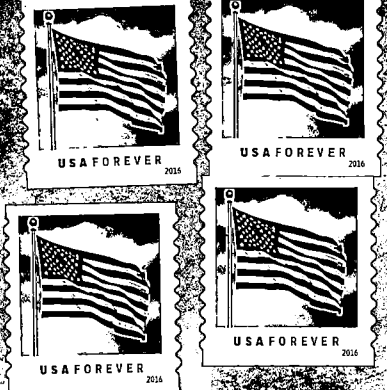
Charles T. Brooks, III

CTB,III/jlm

Enclosures as stated

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

✓



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