

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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FEB 15 2017

Appeal from the Administrative Law Court
Carolyn C. Matthews, Administrative Law Judge

S.C. SUPREME COURT

Court of Appeals Opinion No. 2016-UP-392
Appellate Case No. 2016-002510

Joshua Cramer, #251406, Respondent,

v.

South Carolina Department of Corrections, Petitioner.

**MOTION BY THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS
TO EXTEND THE DEADLINE BY WHICH IT MAY FILE ITS REPLY
TO THE RESPONDENT’S RETURN TO ITS
PETITION FOR WRIT OF CERTIORARI**

On February 13, 2017, 2016, the undersigned counsel for the South Carolina Department of Corrections [“SCDC”] received, via United States Mail, the *pro se* Respondent’s return to SCDC’s petition for a writ of certiorari in the above-captioned matter.

Both the Respondent’s return and the allied proof of service were dated February 7, 2017, while the envelope in which the Respondent served his return was postmarked February 8, 2017.

SCDC’s undersigned counsel now respectfully moves the Court to extend the deadline by which he may file and serve SCDC’s reply to Mr. Gatewood’s response. Specifically, SCDC’s undersigned counsel respectfully moves for an extension of the deadline until Monday, February 27, 2017, and he so moves in light of obligations he currently confronts in other cases.

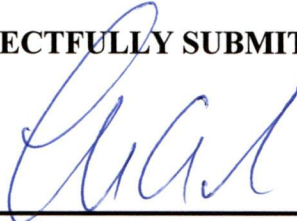
SCDC's undersigned counsel currently confronts a deadline of February 16, 2017 by which to file a brief on behalf of SCDC in a matter pending before the South Carolina Administrative Law Court and styled as *Steven L. Barnes v. S.C. Dep't of Corr.*, Docket No. 15-ALJ-30-0318-AP. However, Mr. Barnes' counsel consented in e-mails he exchanged with SCDC's undersigned counsel on the morning of February 15, 2017 to a short extension of the deadline associated with SCDC's brief. Specifically, Mr. Barnes' counsel consent to a new deadline of no later than Friday, February 24, 2017 for SCDC's brief.

SCDC's undersigned counsel also confronts a deadline of February 23, 2017 by which to file and serve materials on SCDC's behalf in another matter pending before the South Carolina Administrative Law Court and styled as *Joseph H. Gibbs v. S.C. Dep't of Corr.*, Docket No. 16-ALJ-04-0380-AP.

SCDC's undersigned counsel is further currently engaged in discovery activity associated with two (2) other matters pending in circuit court and styled as *Joseph P. Sellaro v. S.C. Dep't of Social Services, et al.*, Civil Action No. 2016-CP-40-5299, and *Peter G. Oliver v. University of South Carolina, et al.*, Civil Action No. 2015-CP-40-3502.

Therefore, in light of the above-described obligations, as well as the upcoming Presidents' Day holiday on Monday, February 21, 2017, SCDC's undersigned counsel respectfully urges this Court to grant his instant motion and, by doing so, extend the deadline by which SCDC may file and serve its reply to the Respondent's return to SCDC's petition for writ of certiorari until Monday, February 27, 2017

RESPECTFULLY SUBMITTED:



February 15, 2017

Lake E. Summers

Malone, Thompson, Summers & Ott LLC

339 Heyward Street, Suite 200

Columbia, South Carolina 29201

Office: (803) 254-3300

Fax: (803) 254-0309

E-mail: summers@mtsolvlawfirm.com

Counsel for the South Carolina
Department of Corrections

Pro se Respondent:

Joshua Cramer, #251406

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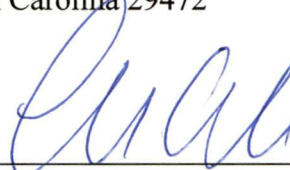
South Carolina Department of Corrections, Petitioner.

PROOF OF SERVICE

I certify that I have served the **MOTION BY THE SOUTH CAROLINA DEPARTMENT OF CORRECTIONS TO EXTEND THE DEADLINE BY WHICH IT MAY FILE ITS REPLY TO THE RESPONDENT'S RETURN TO ITS PETITION FOR WRIT OF CERTIORARI** on the above-named *pro se* Respondent by mailing a copy of the same to him, first class postage pre-paid, at the following address:

Joshua Cramer, #251406
Lieber Correctional Institution
SA-17
Post Office Box 205
Ridgeville, South Carolina 29472

February 15, 2017



LAKE E. SUMMERS