

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Deborah Brooks Durden, Administrative Law Judge

Case No. 11-ALJ-30-0489-AP

E. Shawn Sorrell,

Appellant,

v.

South Carolina Department of
Public Safety,

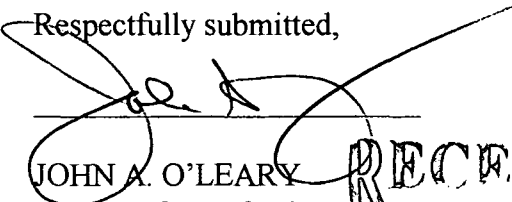
Respondent

MOTION TO ALLOW ORAL ARGUMENTS

NOW COMES the Appellant, E. Shawn Sorrell, by and through his attorney John O'Leary, moves that this court allow oral arguments since this case involves a question of extreme importance due to the panels decision which incorrectly determined the concept of probable cause which served for the underlying basis for the termination.

Mr Sorrell was terminated based upon incorrect determination as to the law of probable cause, the sole underlying basis for his termination from state employment.

Respectfully submitted,



JOHN A. O'LEARY
Attorney for Defendant
714 Calhoun St.
Columbia, SC 29201
Phone: (803) 779-5556

RECEIVED

JAN 22 2013

SC Court of Appeals

Columbia, South Carolina
January 18, 2013

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CERTIFICATE OF SERVICE

I, the undersigned employee of O'Leary Associates, P.A., attorneys for SCDPS, certify that I have served the foregoing document(s) on the individual(s) listed below on January 18, 2013 by placing a copy of the same in the United States Mail, postage prepaid, and return address clearly affixed to the following address:

PERSON SERVED:

Vance Bettis
Gignilliat Savitz & Bettis, LLP
900 Elmwood Street, Suite 100
Columbia, SC 29201

DOCUMENTS:

MOTION TO ALLOW ORAL ARGUMENTS



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SC Court of Appeals

O'LEARY ASSOCIATES, P.A.

JOHN A. O'LEARY, ATTORNEY

Katie O'Leary Fayssoux (of Counsel)

January 18, 2013

SC Court of Appeals
Jenny Abbott Kitchings, Clerk of Court
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

RE: Edwin Shawn Sorrell vs. SCDPS
Case No(s): 2012-212714

Dear Ms. Kitchings:

Enclosed for filing please find the original and two copies of Appellant's Motion to Allow Oral Arguments in the above matter. A self-addressed, stamped envelope is provided for your convenience in returning a clocked copy of the same. By copy of this letter I am serving the same on Vance Bettis.

Thank you for your time and consideration in this matter. If you have any questions or if we may be of assistance, please do not hesitate to call.

Sincerely,



JOHN A. O'LEARY
Attorney At Law

JAO/ck JB
Enclosures

cc: Vance Bettis
Gignilliat Savitz & Bettis, LLP
900 Elmwood Street, Suite 100
Columbia, SC 29201

for.
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