

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM LEE COUNTY  
Court of Common Pleas

The Honorable George M. McFaddin, Jr., Judge  
Lee County Court of Common Pleas

**RECEIVED**  
MAR 08 2019  
SC Court of Appeals

Case No. 2014-CP-31-00100

Levi Bing, ..... Appellant,

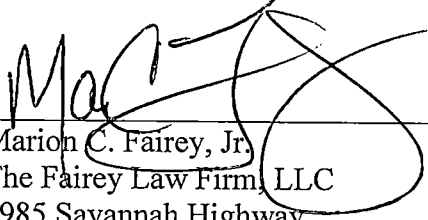
v.

South Carolina Department of Corrections, ..... Respondent.

APPELLANT'S MOTION FOR AN EXTENSION OF TIME  
TO FILE INITIAL BRIEF

The Appellant respectfully submits this motion for an extension of time to file its response to Respondent's Initial Brief. The Respondent's Initial Brief was mailed on February 25, 2019, making Appellant's Response due on March 7, 2019. The Appellant has a date certain trial set in Orangeburg County the week of March 11-15, 2019 as well as two other court appearances on March 7 and March 18, 2019. The Appellant respectfully requests an additional fifteen (15) days in which to file the response to Respondent's initial reply brief, which would make it due on March 22, 2019. Counsel for the Respondent has been consulted and consents to this motion.

Counsel for the Appellant:



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THE DEAN LAW FIRM  
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(803) 534-5091  
[Clydedean5019@gmail.com](mailto:Clydedean5019@gmail.com)

March 5, 2019  
Hampton, South Carolina

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The Honorable George M. McFaddin, Jr., Judge  
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Case No. 2014-CP-31-00100

Levy Bing, ..... Appellant,

v.

South Carolina Department of Corrections, ..... Respondent.

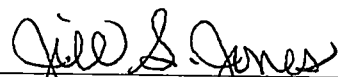
Proof of Service

I certify that on March 5, 2019, I have served a copy of the Appellant's Motion for an  
Extension of Time to File Initial Brief by United States Mail, postage prepaid, addressed to:

G. Murrell Smith, Jr.  
LEE, ERTER, WILSON, HOLLER  
& SMITH, LLC  
126 North Main Street  
Post Office Box 580  
Sumter, South Carolina 29151

The Honorable Jenny Abbott Kitchings  
Clerk of South Carolina Court of Appeals  
1220 Senate Street  
P. O. Box 11629  
Columbia, SC 29211

*<signature page to follow>*



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March 5, 2019  
Hampton, South Carolina

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MARION C. FAIREY, JR.

[bfairey@faireylaw.com](mailto:bfairey@faireylaw.com)

March 5, 2019

Via U.S. Mail and Facsimile (803-734-1839)

The Honorable Jenny Abbott Kitchings  
Clerk of the South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

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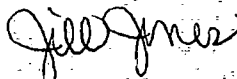
**Re: Levi Bing v. South Carolina Department of Corrections  
Case No. 2014-CP-31-00100**

Dear Ms. Kitchings:

Please find enclosed the original and one copy of the *Appellant's Motion for an Extension of Time to File Initial Brief* and the *Certificate of Service* regarding this case. Please file the originals and return the stamped copies to me in the enclosed envelope. Our check in the amount of \$50.00 is also enclosed.

Please accept my kindest regards.

Sincerely,



Jill S. Jones

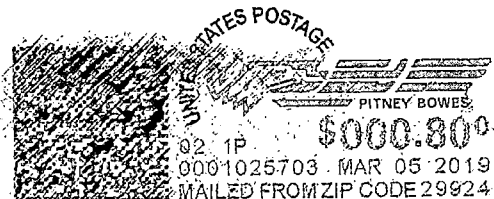
Legal Assistant to Marion C. Fairey, Jr.

Enclosures (as stated)

cc: Murrell Smith  
Clyde C. Dean, Jr.

✓

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Hampton, SC 29924



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