

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable DeAndrea G. Benjamin, Circuit Court Judge

Case No: 2019-000088

Edward L. Green.....Appellant

v.

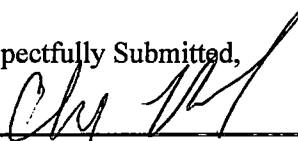
Mark Keel, Chief of the South Carolina Law Enforcement Division and the State of South
CarolinaRespondent

MOTION TO REQUEST EXTENSION

The above-named Appellant, by and through his undersigned counsel, does hereby respectfully moves this Court to hereby request a 30-day extension of time to file the Appellant's Initial Brief and 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 criminal trials 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
March 5, 2019

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MAR 11 2019
SC Court of Appeals

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Appellant,

v.

Mark Keel, Director South
Carolina Law Enforcement
Division (SLED) and the State
of South Carolina,

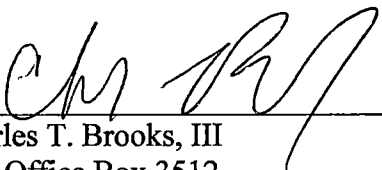
Respondent.

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PROOF OF SERVICE

I certify that I have served the Motion for Extension on Mark Keel, Director South Carolina Law Enforcement Division (SLED) by depositing a copy of it in the United States Mail, postage prepaid, on January 17, 2019, addressed to their attorneys of record, Adam L. Whitsett, Post Office Box 21398, Columbia, South Carolina 29221 and that I have served The State of South Carolina by depositing a copy of it in the United States Mail, postage prepaid, on January 17, 2019, addressed to their attorneys of record, Harley L. Kirkland and Kevin D. Maroney, Post Office Box 11549, Columbia, South Carolina 29211.

March 7, 2019



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Attorney for Appellant

The Brooks Law Office, LLC

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

RE: Green vs. Mark Keel, Chief of the South Carolina Law Enforcement Division, et al
Appellate Case No.: 2018-000088

Dear Ms. Kitchings:

Please find enclosed herewith the Appellant's Motion to Request Extension with reference to the above case. I have also provided the necessary copies and filing fees for this Motion. Please return the filed copy(ies) to my attention in the provided return envelope.

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

With kind regards,

Sincerely,



Charles T. Brooks, III

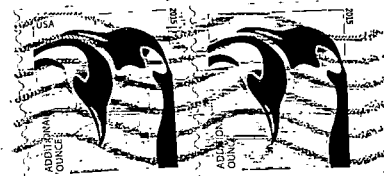
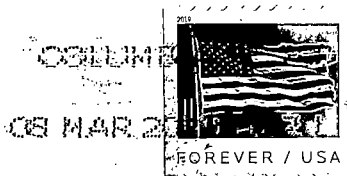
CTB,III/jlm

Enclosed as stated

cc: Adam Whitsett, SLED
Harley Kirkland, SCAG Office

J

CHARLES T BROOKS III
ATTORNEY
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South Carolina Court of Appeals
ATTN: Clerk
Post Office Box 11629
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29211-162929

